



John Mueller &lt;john@keweenawresort.com&gt;

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## Keweenaw Dark Sky Wilderness Nomination Complete

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Ashley Wilson <ashley@darksky.org>  
To: John Mueller <john@keweenawresort.com>

Tue, Feb 15, 2022 at 5:21 PM

Hi John,

Thanks for checking in. I apologize for my delayed response. I have been quite busy with training my new associate and working on the IDSP Guidelines revisions. I am also still working on providing specific instructions for your Park to move forward in the application process, but I can tell you where I am currently at so you are aware.

The number one topic we need to address is the level of 'protection' of the Keweenaw Mountain Lodge as an International Dark Sky Park. We define Parks as, "An International Dark Sky Park (IDSP) is a land possessing an exceptional or distinguished quality of starry nights and a nocturnal environment, and that is specifically protected for its scientific, natural, educational, and/or cultural heritage resources, and/or for public enjoyment. The land may be publicly owned, or privately owned, provided that the landowner(s) consent to the right of permanent, ongoing public access to specific areas included in the IDA designation." While we have privately owned places in the Program, they are either associated with a conservation-based organization or are a non-profit, so their intentions and policy towards conserving a natural resource are clear. However, since Keweenaw Mountain Lodge is a for-profit business, the level of protection other than your word is not clear. To ensure the validity of the perpetual protection of dark skies at your site, the Dark Sky Places Committee is requesting that you design a conservation land easement with an appropriate land trust or governmental authority.

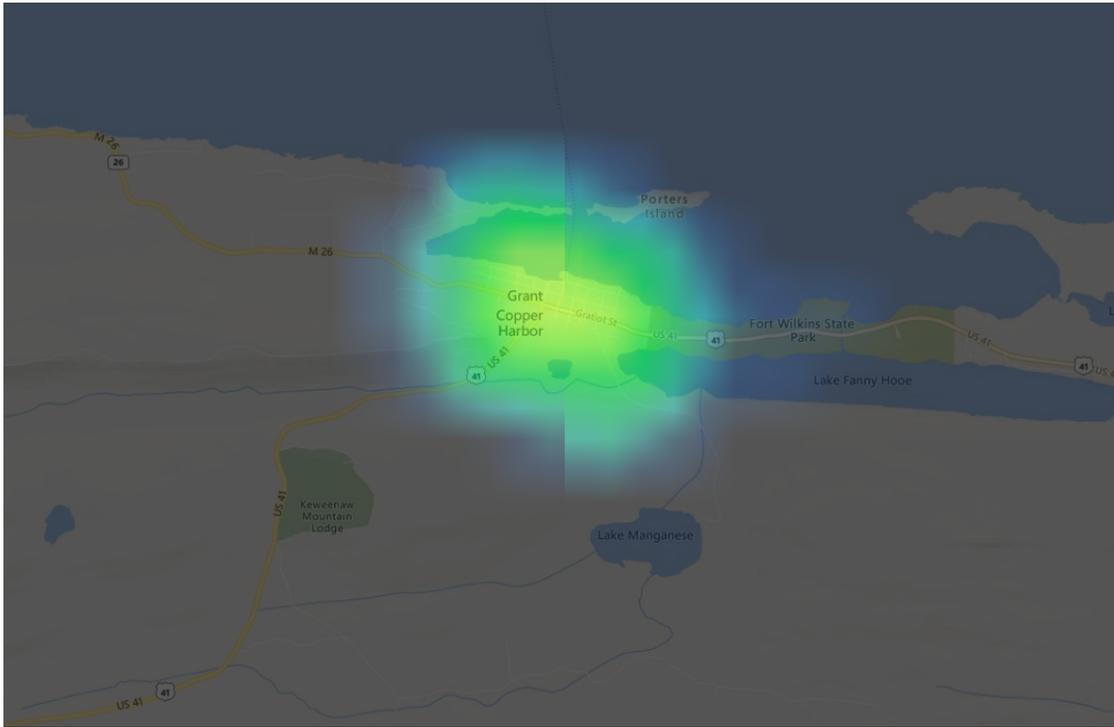
I am currently working with our general counsel to have specific instructions and language that you should use to meet this request, which is the main reason why my response to you is taking so long. Of course, you are more than welcome to start investigating the appropriate course of action to meet this need before I have more guidance prepared. On the other hand, if your lodge is not able to procure a conservation land easement, we may need to discuss other options, such as certifying Keweenaw Mountain Lodge as a Dark Sky Destination when that is available later this year. I am pushing back on this suggestion as much as possible, as both John Barentine and myself agree that you have met the requirements to be a Dark Sky Park, but the DSPC is hard set in seeing a land easement and definitive protections before continuing this conversation.

On top of that, there is the question of public access to your site at night, especially from visitors that do not use lodging as an accommodation. I know you and the application state that the lodge grounds are open to visitors, but there is little evidence to support this notion. Is there a way where you can track visitors who come to the Lodge at night just for stargazing? Additionally, your website does not make it clear that you invite visitors to the site just for stargazing. Primarily, looking at both the [hours of operation](#) and [stargazing](#) pages, I do not get the impression that these accommodations are available to the general public. What are some ways that you can find evidence to prove your intentions to be open to the public before and after a Park certification?

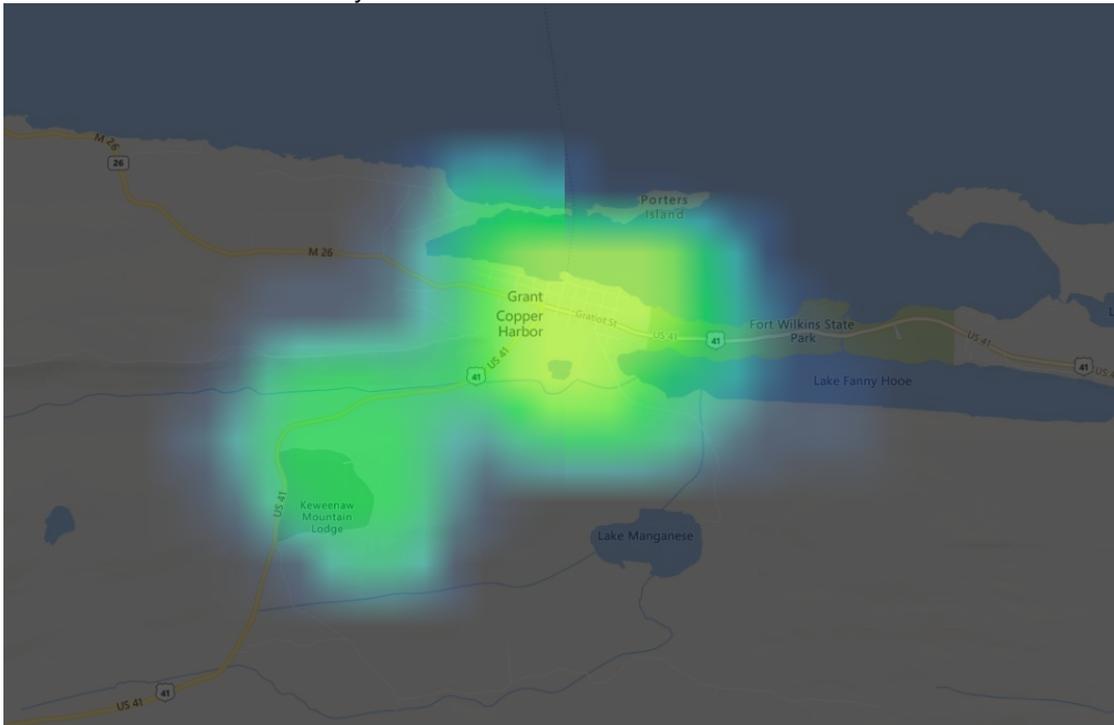
The DSPC has also requested that you change the name of the proposed site to not include the word 'wilderness.' The Wilderness Act of 1964 defines it as "an area where the earth and its community of life are untrammled by man, where man himself is a visitor who does not remain." The DSPC believes that a site with a golf course does not meet this definition and denies the name request. I apologize for not providing correct guidance in this regard.

I also have a list of more minor comments for you to address:

- The application needs to note the development state of nearby communities or sources of potential threats, such as the harbor lights or nearby developments. One of the committee members noticed the steep incline of emitted light inside and around the lodge from the past five years. Here is a screenshot of emitted light in 2015, in which you can see the Lodge is dark and no light is detected:



And here is the same area six years later:



Copper Harbor appears to be slightly brighter, and now the area of emitted light encapsulates the lodge and surrounding area. It would be ideal for you to identify the source of this light pollution, why it is growing, and what the lodge can do to help curb or even reduce the spread of excessive light to preserve your night sky quality. Additionally, I would like to see more language in a 'future plans' section. You alluded to this on page 29 but it is vague. There is also the outreach commitment on page 60, but that doesn't necessarily address the impending threat to your dark skies. What will the lodge do specifically to educate the properties responsible for this lighting and encourage them to adopt dark-sky friendly lighting?

- The DSPC was surprised by the selection of light intensity for your fixtures, especially the nearly 10,000 lumens fixtures on the main cabin. I did not say anything when I read your application because IDA does not provide prescriptive guidance for light intensity specifically. However, the DSPC did note that our Guidelines states, "The use of outdoor light at night is only prescribed when it is strictly needed, where it is needed, and in the appropriate amount for a specific task. The purpose of outdoor light allowed under the policy must be specifically to ensure public safety." (page 9) Overlighting has not been proven to enhance human safety, and because of our eyes' ability to dark adapt, we can see surprisingly

well with low amount of light. For context, I would have used closer to 1,000 lumens for that fixture, so your intensity is 10x's greater than what is necessary for that task. There are multiple examples of overly bright fixtures in the application. To resubmit the application, it would be ideal for you to either replace the fixtures with an appropriate intensity or use a motion sensor and only use these lights when needed.

- The DSPC is also requesting that you find an external IDA nominator if possible. We do state that an applicant can self-nominate, but usually that means the application is written by an external person/party and the administrative letter of support comes from a different person who is in charge of the site itself. I believe you said you made contact with Starry Sky Lake Superior and I would see if they would be able to write the nomination letter on your behalf.

- Page 10 references the national registry of historic places, but this needs a correct reference and has to be accurate to the site location. A DSPC member tried to find your site specifically in this registry and could not find it. Either provide the appropriate reference or remove.

- Page 104 there is no link below the reference to Mike Miller's program; please add.

I am sure that is a lot to take in, but rest assured I am willing to work with you as much as possible to provide the Dark Sky Park certification to your site. If it would be best to have a conversation over Zoom, let me know. I would suggest waiting for me to finish my guidance for the conservation land easement before we meet. However, if you have questions about anything else I mentioned here, feel free to ask and I will do my best to provide updated guidance.

Let's take this one step at a time and continue to make progress on all of the effort and commitment you have shown towards dark skies.

Ashley

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