



# United States Department of the Interior

NATIONAL PARK SERVICE  
Apostle Islands National Lakeshore  
Route 1, Box 4  
Bayfield, Wisconsin 54814-9599

IN REPLY REFER TO:

Dear Friend of the Apostle Islands National Lakeshore:

Following three years of effort, it gives me great pleasure to release the *Final Wilderness Study / Environmental Impact Statement* for Apostle Islands National Lakeshore. The purpose of the wilderness study has been to develop a proposal to the Director of the National Park Service, the Secretary of Interior, the President, and ultimately the United States Congress regarding how much, if any, of Apostle Islands National Lakeshore should be designated as wilderness. That proposal will be documented in the study's Record of Decision, which is scheduled to be released in a few weeks.

We can easily say that there has never been an issue at Apostle Islands National Lakeshore that has generated more interest and discussion. During the past three summers, we met with hundreds of you at 15 open houses, dozens of meetings with local governments and organizations, and even a formal public hearing. In all, nearly 10,000 people sent us their comments. We learned a lot from you, and I can honestly say that the results of the study would not have been the same without your input.

We have learned that some level of designated wilderness in the Apostle Islands makes sense to many, many people. We have also learned that many of you are anxious about preserving the level of access to the islands that you currently enjoy. In terms of the sheer quantity of comments, these were the two central issues of the study. We have worked hard to ensure that all of the action alternatives (alternatives B, C, and D) will guarantee both – preserving the wildest parts of the islands themselves as wilderness, while also preserving the means of access to the islands that our visitors enjoy today.

What will the Apostle Islands National Lakeshore be like if wilderness were designated by Congress in the future? From a modern visitor's perspective, the change would be nearly imperceptible. Many have asked us "Why bother if nothing will change?" My favorite reply has been to state that the answer is in the question. The vast majority of the islands are wild, and nearly everyone we spoke to oppose any major change in development levels in the park. "It's perfect," they say, "don't change it." We believe that wilderness is the best way to ensure that the Apostle Islands experience that you treasure today will be as tangible and as accessible to future generations as it is to you. Perhaps that earlier question could be reframed "Why *not*, if nothing will change?"

The past three years have been extremely rewarding for us. I'm grateful for the dialogue, and for all the relationships that sprang from it, and I urge you all to remain engaged in future issues at Apostle Islands National Lakeshore.

Sincerely,

Bob Krumenaker  
Superintendent, Apostle Islands National Lakeshore

**FINAL  
WILDERNESS STUDY /  
ENVIRONMENTAL IMPACT STATEMENT**

**March 2004**

---

**APOSTLE ISLANDS**

**National Lakeshore • Wisconsin**

*(Back of Title Page Blank)*

**FINAL WILDERNESS STUDY  
ENVIRONMENTAL IMPACT STATEMENT  
APOSTLE ISLANDS NATIONAL LAKESHORE  
Bayfield and Ashland Counties, Wisconsin**

This *Final Wilderness Study / Environmental Impact Statement (EIS)* describes and analyzes four alternatives for designating wilderness in Apostle Islands National Lakeshore. Based on the findings of this study, a formal wilderness proposal will be submitted to the Director of the National Park Service for approval and subsequent consideration by the Department of the Interior, President, and Congress under the provisions of the Wilderness Act.

**Alternative A**, the “no-action” alternative, provides a baseline for comparing the other alternatives. Under this alternative, no wilderness would be proposed in the park. This could lead to major changes in the management of Apostle Islands National Lakeshore, because 97% of the park’s land base has been managed as *de facto* wilderness since 1989.

This wilderness study includes three alternatives that propose wilderness areas of differing sizes and locations in the park. None of the waters of Lake Superior would be proposed as wilderness under the alternatives. **Alternative B** would propose the highest amount of wilderness (94% of the land base). Only the areas determined to be not suitable for wilderness would be excluded. **Alternative C**, the National Park Service’s **preferred alternative**, would propose that 80% of the park’s land base be permanently protected as wilderness. This alternative is intended to ensure that there will be outstanding opportunities for people to learn both the stories of the people who settled and altered these islands and the story of the subsequent restoration of the park’s “wilderness” qualities. It also strives to minimize the number of small, fragmented areas of wilderness or nonwilderness. **Alternative D** would limit wilderness to remote areas and cover about 55% of the park’s land base. It would include those undeveloped and isolated areas that provide the best opportunities for solitude and primitive recreation during the busy summer season. These areas are not on the current tour boat route, and generally are more distant from the mainland.

This document also discusses the potential consequences of each alternative’s actions on natural resources, cultural resources, wilderness resources, visitor nonwilderness experiences, and park operations. Each alternative has a mix of beneficial and adverse impacts. The main benefits of alternative A are that it would provide maximum flexibility to park managers to expand recreational and interpretive facilities into new areas and to carry out park programs and operations, and that it would allow the greatest number of the park’s cultural resources to be protected in the largest variety of ways. Alternatives B, C, and D would better protect the park’s natural and wilderness resources in the long term than alternative A (largely in proportion to the amount of wilderness recommended in each) and would also provide additional indirect protection to many of the park’s cultural resources. The main drawbacks of alternative A are that it would provide the least amount of protection against potential new development-related impacts to natural, cultural, and wilderness resources, and it would provide the least amount of certainty that the park would continue to look and feel as it does today. Alternatives B, C, and D would offer reduced levels of flexibility to park managers to expand the level of development in the areas recommended for wilderness, which may put development pressure on the areas excluded from the proposals. These alternatives would also reduce, but do not eliminate, the treatment options available for cultural resources contained within the areas recommended for wilderness. The National Park Service believes that Alternative C would provide the best mix of beneficial impacts, while minimizing many of the adverse ones.

The public review period on the *Draft Environmental Impact Statement* ran from July 11–October 17, 2003, and included several public open houses and one formal public hearing. The no-action period on this final study and environmental impact statement will end a minimum of 30 days after the Environmental Protection Agency has accepted the document and published a notice of availability in the *Federal Register*. For further information, contact the park wilderness study coordinator, Jim Nepstad, Apostle Islands National Lakeshore, Route 1, Box 4, Bayfield, WI 54814, write an e-mail message at [apis\\_comments@nps.gov](mailto:apis_comments@nps.gov), or call 715-779-3398, extension 102.

## A GUIDE TO THIS DOCUMENT

This document contains the *Final Wilderness Study*, which is intended to determine if and where lands and waters within the Apostle Islands National Lakeshore should be proposed for wilderness designation.

### **FINAL WILDERNESS STUDY / ENVIRONMENTAL IMPACT STATEMENT**

This *Final Wilderness Study / Environmental Impact Statement (EIS)* is organized in accordance with the Council on Environmental Quality's implementing regulations for the National Environmental Policy Act and the National Park Service's Director's Orders on "Park Planning" (DO-2) and "Environmental Analysis" (DO-12).

**Chapter 1: Purpose of and Need for the Wilderness Study** sets the framework for the entire document. It describes why the study is being prepared and what needs it must address. It gives guidance for the alternatives that are being considered, which are based on the Wilderness Act, 1989 *General Management Plan for Apostle Islands National Lakeshore*, and NPS management policies.

The chapter also provides background on the wilderness study and details the issues and concerns that were raised during public scoping meetings. This chapter concludes with a statement of the scope of the environmental impact analysis; specifically what impact topics were or were not analyzed in detail.

**Chapter 2: Wilderness Alternatives**, begins by describing what areas were considered not suitable for wilderness designation. It then describes a no-wilderness alternative (alternative A, the no-action alternative). Alternatives B, C (the agency's preferred

alternative), and D are then presented, which propose varying areas for wilderness designation. Next, there is a discussion of which alternative was determined to be the environmentally preferred alternative and a description of alternatives considered but dismissed. The chapter concludes with summary tables of the alternatives and the environmental consequences of implementing those alternative actions.

**Chapter 3: Affected Environment** describes those areas and resources that would be affected by implementing the various alternatives – natural resources, cultural resources, wilderness resources (including the visitor wilderness experiences), visitor experiences in the nonwilderness areas, and park operations.

**Chapter 4: Environmental Consequences** analyzes the impacts of implementing the alternatives on the topics described in the "Affected Environment" chapter. Methods that were used for assessing the impacts in terms of the intensity, type, and duration of impacts are outlined at the beginning of the chapter.

**Chapter 5: Consultation and Coordination** describes the history of public and agency coordination during the wilderness study effort and lists agencies and organizations who will be receiving copies of this document. This part also includes copies of organizations' and selected individuals' comment letters and NPS responses to substantive comments.

The **Appendixes** present supporting information for the document, along with selected references, a glossary, a list of the study authors, and an index.

## SUMMARY

The purpose of this wilderness study is to determine if and where lands and waters within the Apostle Islands National Lakeshore should be proposed for wilderness designation. The study identifies a range of possible wilderness configurations within the park and evaluates their effects. Based on the findings of this study, a formal wilderness proposal will be submitted to the Director of the National Park Service for approval and subsequent consideration by the Department of the Interior, President, and Congress under the provisions of the Wilderness Act.

The *National Park Service (NPS) Management Policies 2001* (§6.2.1, NPS 2000) require that all lands administered by the National Park Service be evaluated for their suitability for inclusion within the national wilderness preservation system. When the state of Wisconsin donated lands in the Apostle Islands to the National Park Service, it requested that the wilderness qualities of these lands be protected. The 1989 *General Management Plan* for Apostle Islands National Lakeshore directed that a formal wilderness study be done for the lands and waters within the park to determine if areas should be proposed to Congress for wilderness designation. The plan stated that about 97% (41,054 acres) of the park's land base may be suitable for wilderness and instructed that these lands "...be managed to preserve their potential wilderness values until a formal wilderness study has been completed and forwarded to Congress." For the past 14 years the National Park Service has managed these lands to preserve their wilderness values pending completion of a wilderness study.

In the 2001 Department of Interior appropriations bill, Congress specifically directed that the National Park Service conduct a wilderness study for the Apostle Islands National Lakeshore.

## WILDERNESS STUDY PROCESS

In the summer and fall of 2001 the National Park Service began to seek public input on wilderness designation for the Apostle Islands. The public raised several major issues and concerns regarding designating or not designating wilderness during the scoping period, including:

- impacts of potential new developments on the islands
- changes in access to the park
- changes in visitor uses and experiences
- impacts to local communities and the economy
- impacts on Native American treaty rights
- protection of cultural resources
- changes in park operations

Once the issues were understood, the study team began to identify draft alternatives for designating wilderness in the park. In preparing these alternatives, the study team first identified those areas in the park that clearly do not meet the Wilderness Act suitability criteria (see the "Planning Background: Wilderness and the Apostle Islands" section for a list of the suitability criteria). Eight areas or types of areas were found to be clearly not suitable as wilderness and therefore were not considered in any of the wilderness study alternatives:

- waters and submerged lands of Lake Superior up to the high-water mark
- public docks on the islands
- the mainland unit
- light stations and adjoining cultural landscapes
- housing/administration areas on Stockton, Rocky, Sand, and Oak Islands
- Manitou Island fish camp
- Southeast tip of Sand Island
- West Bay Club on Sand Island

The study team initially identified six draft alternative proposals for designating wilderness in the park. A series of open houses and meetings were then held with the public and interested organizations in July 2002 to gather public input on the alternatives and determine which alternative was favored. After analyzing this public input, the study team revised the alternatives and dropped two of the preliminary alternatives. The four remaining alternatives (which have been renamed) and their environmental impacts are presented in this final document. A preferred alternative was selected among these alternatives using a “Choosing by Advantages” (CBA) process.

*The Draft Wilderness Study / Environmental Impact Statement* was published in July 2003. The National Park Service accepted comments on the draft study for over 90 days. A series of public meetings were held on the study in July and August, and a formal public hearing was held in Ashland, Wisconsin, on August 27. The comment period ended on October 17, 2003. No major changes were made to the alternatives in the draft document or to the analysis of environmental consequences.

## ALTERNATIVES

### Alternative A (No Wilderness)

This alternative, the “no action alternative,” is required under the National Environmental Policy Act. It provides a baseline for comparing the changes and impacts of the other alternatives. Under this alternative no wilderness would be proposed for Apostle Islands National Lakeshore. If this alternative were selected, it is assumed that Congress would approve the no wilderness recommendation. As a result, the National Park Service would no longer be required to manage the park to protect the area’s wilderness values. However, for at least the short term the National Park Service would continue to protect and maintain the park’s wilderness characteristics indirectly through the existing zoning framework in the 1989 *General Management Plan*. In the long term it is possible that alternative A could be a departure from how the National Park Service has managed Apostle Islands National Lakeshore in the past – when the existing general management plan is revised or a new general management plan is adopted, the management directions for the park could change, which may result in less protection for wilderness resources in parts of the park.

### Alternative B (Maximize Wilderness)

Alternative B only excludes the areas determined to be not suitable in all of the alternatives. Of all the alternatives, alternative B would be most similar to how Apostle Islands National Lakeshore is currently being managed because 97% of the park’s land base is being managed as *de facto* wilderness. Altogether, approximately 39,500 acres of the park’s 42,160-acre land base (94%) would be proposed

as wilderness under alternative B (see the Alternative B map on page 31). This is the equivalent of 57% of the entire park (69,372 acres), if one considers the waters as well as the lands within the park boundary.

### **Alternative C (Preferred Alternative and Environmentally Preferred Alternative)**

Alternative C is the National Park Service's preferred alternative for designating wilderness in Apostle Islands National Lakeshore. This alternative is intended to permanently protect most of the park's natural, cultural, and wilderness resources. It also is intended to ensure that there will be outstanding opportunities for people to learn both the stories of the people who settled and altered these islands and the story of the subsequent restoration of the park's "wilderness" qualities. Basswood, Sand and Long Islands would not be included in this wilderness proposal. Alternative C also would also strive to minimize the number of small, fragmented areas of wilderness or nonwilderness.

Altogether, approximately 33,500 acres of the park's 42,160-acre land base (80%) would be proposed as wilderness under alternative C (see the Alternative C map on page 35). This is the equivalent of 48% of the entire park (69,372 acres), if one considers the waters as well as the lands within the park boundary.

### **Alternative D (Limit Wilderness to Remote Areas)**

Alternative D emphasizes those remote, isolated areas that provide the best opportunities for solitude and primitive recreation during the busy summer season. These areas are not on the current tour boat route, and generally are more distant from the mainland. Altogether, approxi-

mately 23,000 acres of the park's 42,160-acre land base (55%) would be proposed as wilderness under alternative D (see Alternative D map on page 39). This is the equivalent of 33% of the entire park (69,372 acres), if one considers the waters as well as the lands within the park boundary.

## **ENVIRONMENTAL CONSEQUENCES**

The study team evaluated the potential consequences the different wilderness proposal alternatives would have on natural resources, cultural resources, wilderness resources, visitor nonwilderness experiences, and park operations. In order to analyze the impacts of wilderness designation it was assumed that Congress would approve the no wilderness recommendation. It was further assumed that if wilderness was not designated in the park, administrative or visitor developments could be built in the undeveloped parts of the islands, provided they were consistent with the park's general management plan. It was also assumed that the current general management plan could be modified to allow new development in areas outside the current development zones. The beneficial or adverse effects of wilderness designation were categorized as either short or long term, and their intensity was rated as negligible, minor, moderate, or major. The impacts of the alternatives are summarized in table 3. No cumulative impacts were identified in any of the alternatives. None of the impacts in the alternatives were found to be of sufficient intensity to constitute an impairment of park resources and values. No impacts were identified due to wilderness designation that would require mitigation measures.



## **Natural Resources**

Alternative A would have the least certainty that the park's natural resources would continue to be protected and maintained as they have been. Depending on the level and type of future developments that occur, there would be the potential for moderate, adverse, long-term impacts to soils, plants, and coastal processes, and negligible to minor, long-term, adverse impacts to wildlife.

Wilderness designation in alternatives B, C, and D would provide an additional layer of protection and ensure that natural resources would be permanently protected. Alternatives B and C would have moderate, long-term, beneficial impacts in the wilderness area, while alternative D would have minor to moderate, long-term, beneficial impacts. In the nonwilderness areas alternative B would have negligible to moderate, short and long-term impacts on natural resources in localized areas, depending on the new developments that occurred.

Alternative C would have the same type of impacts as alternative B, but more natural resources could be adversely affected in more areas, depending on the level of development that occurred. Likewise, alternative D would have the same type of impacts as alternative B, but more natural resources could be adversely affected in more areas than in alternatives B and C.

## **Cultural Resources**

Alternative A would provide maximum flexibility in managing and preserving cultural resources, including flexibility in locating new developments to avoid cultural resource impacts. But alternative A also has the highest potential of all the alternatives for adverse, long-term impacts

associated with increased visitation in more areas. Depending on the level of development that occurred, alternative A might have the potential for minor to moderate, long-term, adverse impacts to cultural resources throughout the park. However, it appears probable that alternative A would have little or no net impact on cultural resources.

Alternatives B, C, and D have the potential for a mix of beneficial and adverse impacts relative to cultural resources. Some minor, adverse, long-term impacts could occur in the wilderness area in each of the alternatives due to the chance that some structures could be removed and due to reduced flexibility in the treatment options that would likely be used to manage and protect some cultural resources. Moderate, long-term, adverse impacts could occur to cultural resources in the nonwilderness areas under alternative B, and minor to moderate, long-term, adverse impacts in alternatives C and D, if new developments were built near existing developments where there were concentrations of cultural resources.

## **Wilderness Resources**

Because no wilderness is proposed in alternative A, this alternative would provide the least assurance that wilderness resources, such as apparent naturalness and opportunities for solitude, would continue to be protected as they have been. There would be the potential for minor to major, long-term, adverse impacts on wilderness resources, depending on the level of future development that occurred.

Alternatives B and C would have major, long-term, beneficial impacts on wilderness resources, including visitor wilderness experiences, and alternative D

would have moderate, long-term, beneficial impacts, due to permanent protection bestowed by wilderness designation. In the nonwilderness areas alternative B would have some negligible, long-term, adverse impacts on wilderness resources due to new developments. In alternative C there could be some loss of wilderness resources, such as solitude and apparent naturalness, due to potential new developments, primarily on Basswood, Sand, and Long Islands, which would be a minor to moderate, long-term, adverse impact. Under alternative D there could be a loss of wilderness resources due to potential new developments, primarily on 12 islands, which could have a minor to major, long-term, adverse impact.

### **Visitor Nonwilderness Experiences**

Alternative A would have the potential for a minor to moderate, long-term, beneficial impact on those visitor experiences not related to wilderness, primarily due to managers' flexibility to expand recreational and interpretive facilities into new areas. Visitors would have additional opportunities to learn about the park's stories and further understand the area's significance.

Alternative B would have the potential for a moderate, long-term, adverse impact on visitors' nonwilderness experiences, primarily due to limiting the expansion of certain visitor facilities into new areas. Visitors could have fewer new opportunities to gain an understanding of the park and its significance than they would have under alternative A. Removing picnic tables from about a third of the campsites also would adversely affect some visitors' experience.

Alternatives C and D would have both beneficial and adverse impacts on visitors'

nonwilderness experiences. Compared to alternative A, alternative C would have the potential for a minor, long-term, adverse impact, primarily due to limits on the possible expansion of certain visitor facilities, such as nonpersonal, interpretive media, into new areas, which would forego potential opportunities for visitors. Removing picnic tables from about 20% of the campsites also would adversely affect some visitors' experience. Alternative D likewise would have the potential for a negligible, long-term, adverse impact for the same reasons. But both alternatives would have the potential for a beneficial, long-term impact by providing visitors with more opportunities onsite to learn the wilderness and nonwilderness stories of the Apostle Islands. Of all the alternatives, alternative C has the most visible "edge" between wilderness and nonwilderness on the islands, which would provide more opportunities for the National Park Service to educate visitors onsite on the role that wilderness plays in shaping the American cultural and physical landscape. This would have a beneficial impact on some visitors' experience.

### **Park Operations**

All of the alternatives would have the potential for both beneficial and adverse impacts to park operations, depending on the level and type of new developments that occur. Alternative A would have the potential for minor to moderate, long-term, beneficial impacts due to a high degree of management flexibility in carrying out park programs and operations. But increased levels of development that could occur under this alternative also could have minor to major, long-term, adverse impacts on the park's operations, primarily due to increased costs and increased demands on park staff's time and energy, assuming staffing levels did not change.

Compared to alternative A, alternative B could have a minor to moderate, long-term, beneficial impact on park operations, due to new developments mostly being confined to a few areas, which would result in lower operational costs. Alternative B also would have minor to moderate, long-term, adverse impacts due to decreased management flexibility and possible increased costs in managing the few facilities that are in the wilderness area.

Alternatives C and D would have similar effects but in varying intensities due to the changes in the size of the areas being proposed for wilderness. Compared to alternative A, alternative C would have the potential for minor to moderate, long-term, beneficial impacts, and alternative D would have the potential for minor, long-term, beneficial impacts, because there would be fewer areas where new developments would occur. Both alternatives C and D also would have minor, long-term, adverse impacts due to a reduction in management flexibility and possible increased costs of management in the wilderness area.

## THE NEXT STEPS

This *Final Wilderness Study / Environmental Impact Statement*, which includes agency and organization letters and responses to all substantive comments, has been distributed. After a 30-day no-action period has elapsed, a decision will be made on what action the National Park Service intends to take regarding a wilderness proposal for Apostle Islands National Lakeshore. A record of decision will be issued which documents this action. If the decision is made to propose wilderness, and the NPS Director concurs, a wilderness proposal will then be sent to the Assistant Secretary of Fish and Wildlife and Parks and the Secretary of the Interior, who may revise or approve the proposal. The Secretary may then forward a wilderness recommendation to the President. The President may approve or revise the recommendation and then transmit his recommendation to Congress for consideration.

# CONTENTS

## **Purpose and Need for the Wilderness Study 1**

Purpose of and Need for the Action 3

    Purpose of the Wilderness Study 3

    Need for the Wilderness Study 3

Background for the Wilderness Study 6

    Brief Description of Apostle Islands National Lakeshore 6

    Planning Background: Wilderness and the Apostle Islands 6

    Wilderness Suitability Assessment and Study Policies and Guidelines 9

Wilderness Study Process 11

Primary Issues and Concerns 13

    1. Impacts of Potential New Developments on the Islands 13

    2. Access to Apostle Islands National Lakeshore (Motorboats and Sailboats) 13

    3. Changes in Visitor Uses and Experiences 13

    4. Impacts to the Local Communities and Economy 14

    5. Impacts on Native American Treaty Rights 14

    6. Protection of Cultural Resources 14

    7. Park Operations 14

Impact Topics Considered in this Environmental Impact Statement 15

    Natural Resources (General) 15

    Cultural Resources (Archeological Resources, Historic Structures, Ethnographic Resources, and Cultural Landscapes) 15

    Wilderness Resources (Including the Visitor Wilderness Experiences) 16

    Visitor Nonwilderness Experiences 16

    Park Operations 16

Impact Topics Considered but not Analyzed in Detail 17

    Prime and Unique Agricultural Lands 17

    Air Quality 17

    Floodplains and Wetlands 17

    Fish 17

    Threatened & Endangered Species 18

    Lightscape 18

    Soundscape 18

    Museum Objects 19

    Public Health and Safety 19

    Access to Apostle Islands National Lakeshore 19

    Socioeconomic Environment 19

    Land Use 20

    Indian Trust Resources 20

    Environmental Justice 20

    Natural or Depletable Resource Requirements and Conservation Potential 21

    Energy Requirements and Conservation Potential 21

## **Wilderness Alternatives 23**

Introduction 25

Areas Considered not Suitable for Wilderness 26

Alternative A: No Wilderness (No-Action Alternative) 29

Alternative B (Maximize Wilderness) 30

Alternative C (Preferred Alternative and Environmentally Preferred Alternative) 33

Alternative D (Limit Wilderness to Remote Areas) 37  
Environmentally Preferred Alternative 42  
Alternatives Considered but Dismissed 44

## **Affected Environment 47**

Introduction 49  
Natural Resources 50  
    Water Quality 50  
    Geology and Coastal Processes 51  
    Soils 51  
    Vegetation 52  
    Wildlife 53  
Cultural Resources 56  
    Archeological Resources 56  
    Historic Structures 56  
    Ethnographic Resources 57  
    Cultural Landscapes 57  
Wilderness Resources (Including Visitor Wilderness Experiences) 58  
    Minimal Levels of Development 58  
    Opportunities for Primitive, Unconfined Recreation 59  
    Opportunities for Solitude 59  
Visitor Nonwilderness Experiences 60  
    General Visitor Use Patterns 60  
    Island Experiences 60  
Park Operations 62  
    Interpretation and Education 62  
    Protection 62  
    Planning and Resource Management 62  
    Facility Management 63

## **Environmental Consequences 65**

Introduction 67  
Methodologies for Analyzing Impacts 70  
Mitigation Measures, Cumulative Impacts, and Resource Impairment 73  
    Mitigation Measures 73  
    Cumulative Impacts 73  
    Impairment of Park Resources or Values 74  
Impacts on Natural Resources 76  
    Alternative A (No Wilderness) 76  
    Alternative B (Maximize Wilderness) 77  
    Alternative C (Preferred Alternative) 78  
    Alternative D (Limit Wilderness to Remote Areas) 78  
Impacts on Cultural Resources 80  
    Alternative A (No Wilderness) 81  
    Alternative B (Maximize Wilderness) 82  
    Alternative C (Preferred Alternative) 83  
    Alternative D (Limit Wilderness to Remote Areas) 84  
Impacts on Wilderness Resources (Including the Visitor Wilderness Experiences) 86  
    Alternative A (No Wilderness) 86  
    Alternative B (Maximize Wilderness) 86  
    Alternative C (Preferred Alternative) 87

Alternative D (Limit Wilderness to Remote Areas)	88
Impacts on Visitor Nonwilderness Experiences	89
Alternative A (No Wilderness)	89
Alternative B (Maximize Wilderness)	89
Alternative C (Preferred Alternative)	90
Alternative D (Limit Wilderness to Remote Areas)	91
Impacts on Park Operations	93
Alternative A (No Wilderness)	93
Alternative B (Maximize Wilderness)	94
Alternative C (Preferred Alternative)	95
Alternative D (Limit Wilderness to Remote Areas)	97
Other Required Impact Topics	99
Unavoidable Adverse Impacts	99
Irreversible and Irretrievable Commitments of Resources	99
Relationship between Short-Term Uses and Maintenance and Enhancement of Long-Term Productivity	99

## **Consultation and Coordination 101**

Summary of Public Involvement	103
Written Communications and the Internet	103
Public, Agency, and Organizational Meetings	104
Consultations with Native American Tribes	105
Consultation with the Wisconsin State Historical Preservation Office (SHPO)	106
Consultations with the U.S. Fish and Wildlife Service (USFWS)	106
Coastal Zone Consistency Determination	106
Public Officials, Agencies, and Organizations to Whom Copies of the Final Study Were Sent	107
Congressional Delegation	107
State and Local Elected Officials	107
Federal Agencies	107
Native American Tribes and Agencies	107
State of Wisconsin Agencies	108
Local and Regional Government Agencies	108
Organizations and Businesses	108
Libraries	109
Media	109
Public Review of the Draft Wilderness Study / Environmental Impact Statement	110
Record of Public Comment	111
Summary of the Public, Agency, and Organizational Meetings	111
Summary of Written Comments	112
Comments and Responses	113

## **Appendixes / Bibliography / Preparers / Glossary / Index 187**

Appendix A: Wilderness Suitability Assessment Memorandum	189
Appendix B: Letter of Consultation	192
Bibliography	194
Preparers and Contributors	198
Glossary	200
Index	203

## Maps

Location 7	
Alternative B	31
Alternative C	35
Alternative D	39

## Tables

1: Summary of Areas Included in Alternatives A-D	41
2: Summary of Approximate Acreage Proposed for Wilderness in Each Alternative	41
3: Summary of Impacts	45

## **PURPOSE AND NEED FOR THE WILDERNESS STUDY**



*(Back of Divider Page Blank)*

## PURPOSE OF AND NEED FOR THE ACTION

### PURPOSE OF THE WILDERNESS STUDY

The purpose of this wilderness study is to determine if and where lands and waters within the Apostle Islands National Lakeshore (also referred to as the park in this document) should be proposed for wilderness designation. The study identifies a range of possible wilderness configurations within the park and evaluates their effects on the human environment. Based on the findings of this study, a formal wilderness proposal may be submitted to the Director of the National Park Service (NPS) for approval and subsequent consideration by the Department of the Interior, President, and Congress under the provisions of the Wilderness Act.

It is important to note that the purpose of this study is *not* to examine questions regarding how a wilderness area should be administered. These questions would be addressed in a subsequent wilderness management plan, which will be prepared if Congress passes legislation designating any portion of the park as wilderness. (For more details on wilderness management, see the *NPS Management Policies 2001*, which are available on-line at [www.nps.gov/apis/wstudy.htm](http://www.nps.gov/apis/wstudy.htm).) Some questions that a wilderness plan will need to address are listed in the text box on the following page.

### NEED FOR THE WILDERNESS STUDY

The Wilderness Act and *National Park Service Management Policies 2001* (§6.2.1,

NPS 2000) require that all lands administered by the National Park Service be evaluated for their suitability for inclusion within the national wilderness preservation system. Section 6.2.2 further states that “lands and waters found to possess the characteristics and values of wilderness, as defined in the Wilderness Act and determined suitable pursuant to the wilderness suitability assessment, will be formally studied to develop the recommendation to Congress for wilderness designation.”

The 1989 *General Management Plan* (see the Glossary at the back of the document for a list of terms) for Apostle Islands National Lakeshore directed that a formal wilderness study be done for the lands and waters within the park to determine if areas should be proposed to Congress for wilderness designation. The plan stated that about 97% (41,054 acres) of the park’s land base may be suitable for wilderness and instructed that these lands “...be managed to preserve their potential wilderness values until a formal wilderness study has been completed and forwarded to Congress.” For the past 15 years the National Park Service has managed these lands to preserve their wilderness values pending completion of a wilderness study.

In the 2001 Department of Interior appropriations bill, Congress specifically directed the National Park Service to conduct a wilderness study for the Apostle Islands National Lakeshore.

### WHAT IS WILDERNESS?

As defined in the Wilderness Act, wilderness is “...an area of undeveloped Federal land...without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected *primarily* by the forces of nature, with the imprint of man’s work *substantially* unnoticeable; (2) has outstanding opportunities for solitude *or* a primitive and unconfined type of recreation; (3) has at least 5,000 acres of land *or* is of sufficient size as to make practicable its preservation and use in an unimpaired condition....”  
{Emphasis added}

It is important to note that wilderness does *not* have to be pristine or greater than 5,000 acres in size – smaller areas and those that have been previously altered by people can qualify for wilderness designation.

“Potential wilderness” also is a term that the National Park Service uses. As defined in *NPS Management Policies* (§6.2.2.1), potential wilderness is an area that is surrounded by or adjacent to lands proposed for wilderness designation but does not qualify for immediate designation due to temporary, nonconforming or incompatible conditions. If so authorized by Congress, potential wilderness areas become designated wilderness upon the Secretary of the Interior’s determination that the nonconforming use has been removed or eliminated. Areas that may be potential wilderness include areas with use and occupancy cabins and areas where there are rights owned by entities other than the federal government.

## USES AND MANAGEMENT IN WILDERNESS

Although this study is not examining use or management of wilderness, the Wilderness Act and NPS policies permit and prohibit various uses, developments, and actions. These directions need to be considered in evaluating impacts of the wilderness proposals.

A variety of recreational uses, management actions, and even facilities are permitted in wilderness areas under the Wilderness Act and NPS policies. Among the uses, management actions, and facilities *permitted in wilderness* are:

- nonmotorized recreational uses (e.g., hiking, backpacking, picnicking, camping)
- hunting and trapping (where otherwise permitted by law, as in the Apostle Islands National Lakeshore) and fishing
- Native American religious activities and other actions recognized under treaty-reserved rights
- guided interpretive walks and onsite talks and presentations
- use of wheelchairs, service animals, and reasonable accommodations for the disabled that are not in conflict with the Wilderness Act (e.g., barrier-free trails, accessible campsites)
- scientific activities/research
- monitoring programs
- management actions taken to correct past mistakes or impacts of human use, including restoration of extirpated species, controlling invasive alien species, endangered species management, and protection of air and water quality
- fire management activities (including fire suppression)
- protection and maintenance of historic properties eligible for the National Register of Historic Places
- trails
- campsites
- certain administrative facilities if necessary to carry out wilderness management objectives (e.g., storage or support structures, ranger station)
- signs necessary for visitor safety or to protect wilderness resources
- uses and facilities permitted for landowners with valid property rights in a wilderness area

The Wilderness Act also specifically *prohibits* certain uses and developments. Under section 4(d) of the Act, the following uses are not permitted in a wilderness:

- permanent improvements or human habitation
- structures or installations
- permanent roads
- temporary roads
- use of motor vehicles
- use of motorized equipment
- landing of aircraft (except for emergency purposes)
- other forms of mechanical transport (e.g., bicycles)
- commercial enterprises (except for commercial services that are necessary for realizing the recreational or other wilderness purposes of the area, such as guiding and outfitting)

With the exception of permanent roads, the Act does recognize that the above uses *may be permitted* if necessary to meet the minimum requirements for the administration of the area as wilderness or for emergency purposes.

In addition to the above prohibitions, NPS policies also *prohibit* some developments:

- new utility lines
- permanent equipment caches
- site markings or improvements for nonemergency use
- borrow pits (except for small quantity use of borrow material for trails)
- new shelters for public use
- picnic tables
- interpretive signs and trails and waysides (unless necessary for visitor safety or to protect wilderness resources)

## BACKGROUND FOR THE WILDERNESS STUDY

### BRIEF DESCRIPTION OF APOSTLE ISLANDS NATIONAL LAKESHORE

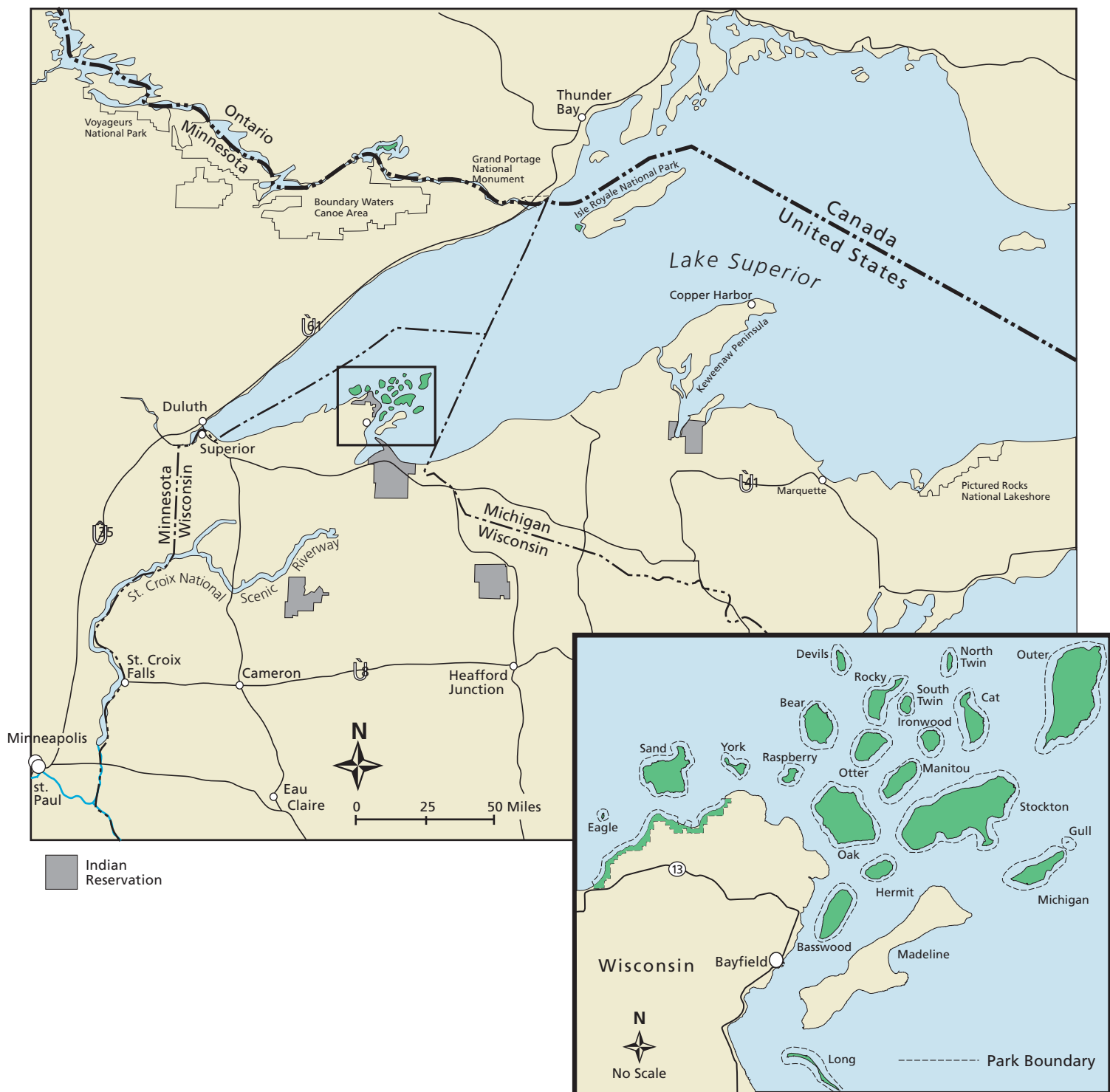
Apostle Islands National Lakeshore, on the tip of the Bayfield Peninsula in northern Wisconsin, includes 21 islands in Lake Superior and a 12-mile narrow strip of mainland shoreline (see figure 1). Established by an act of Congress on September 26, 1970, the purpose of the park is “to conserve and develop for the benefit, inspiration, education, recreational use, and enjoyment of the public” the islands and their related geographic, scenic and scientific values. Apostle Islands National Lakeshore encompasses 69,372 acres, of which 27,323 acres are submerged lands in Lake Superior; the park boundary extends a quarter mile from the shore of the mainland and from each island. The islands range in size from 3-acre Gull Island to 10,054-acre Stockton Island. A variety of scenic features can be found on the islands, including examples of some of the earliest and latest events of geologic history in the lower 48 states. The park features pristine stretches of sand beaches and coves, spectacular sea caves, remnant old growth forests, a diverse population of birds, mammals, amphibians, and fish, and the largest collection of lighthouses in the national park system. People have used the islands for thousands of years. During the historic period, people constructed residences and started farms, fishing operations, brownstone quarries, and logging camps on the islands. Several of these historic sites are listed on the National Register of Historic Places.

### PLANNING BACKGROUND: WILDERNESS AND THE APOSTLE ISLANDS

Throughout the planning efforts that led to the establishment of Apostle Islands National Lakeshore, the importance of protecting the wilderness qualities of the islands was recognized. The 1965 Department of Interior proposal for the park stated that the islands “...should be considered as primitive and wild areas and as such only minimum basic facilities are necessary for their use and enjoyment.” Assistant Secretary of the Interior Leslie Glasgow stated in testimony at a March 1970 Senate hearing that “The majority of the islands are...ideally suited for wilderness camping, hiking, and natural science studies....” Jordahl (1994) noted that in establishing the park Congress clearly intended that, with the exception of Sand Island, the islands be kept wild and primitive.

The state of Wisconsin also directed that wilderness qualities be protected in the park. One of the conditions the Wisconsin legislature stipulated when it donated its lands to the federal government for the park was that this area’s wilderness character be preserved. The legislature stated: “It is the policy of the legislature that the Apostle Islands be managed in a manner that will preserve their unique primitive and wilderness character” (Wisconsin Statutes §1.026(1)(b)).

As noted above, the 1989 *General Management Plan, Apostle Islands National Lakeshore*, called for a formal wilderness study for Apostle Islands National Lakeshore. The *General Management Plan* found approximately 97% of the lands



633 • 20075 • DSC • 6/2003

# Location

## Apostle Islands

## National Lakeshore

U.S. Department of the Interior  
National Park Service



Blank on back of map

in the park under NPS jurisdiction (about 41,054 acres) may be suitable for wilderness. These lands and waters were placed in the natural zone in the *General Management Plan* and have been managed to preserve their potential wilderness values pending completion of a formal wilderness study.

*National Park Service Management Policies 2001* direct that a wilderness suitability assessment be prepared that identifies all areas within the park that potentially qualify as being suitable for wilderness designation. The accompanying text box describes the criteria that are used to determine if areas are suitable for wilderness. On April 27, 2001, the NPS Director concurred that the park's 1989 *General Management Plan* met the requirements for a wilderness suitability assessment (see appendix A).

## **WILDERNESS SUITABILITY ASSESSMENT AND STUDY POLICIES AND GUIDELINES**

The Wilderness Act (PL 88-577) and *National Park Service Management Policies 2001* (NPS 2000) provide directions and guidelines for wilderness suitability assessments, which also apply to wilderness studies. These policies and guidelines delineate existing and future conditions and uses that are compatible with wilderness designation. Congress also implied in the Wilderness Act and the Eastern Wilderness Act (PL 93-622) that wilderness does not have to consist solely of pristine old-growth forest and that lands previously disturbed can be rehabilitated to meet wilderness standards and qualities.

The following directions are particularly relevant to the Apostle Islands National Lakeshore wilderness study:

- *Past Uses* – Lands that have been logged, farmed, grazed, mined, or otherwise utilized in ways not involving extensive development or alteration of the landscape may also be considered for wilderness designation if the effects of these activities are substantially unnoticeable or their wilderness character could be maintained or restored through appropriate management actions.
- *Management* – An area will not be excluded from a determination of wilderness suitability solely because established management practices require the use of tools, equipment or structures, if those practices are necessary to meet minimum requirements for the administration of the area as wilderness.
- *Historic Features* – Historic features that are primary visitor attractions (e.g., light stations) will not be recommended for wilderness designation by Congress. However, an area that attracts visitors primarily for the enjoyment of solitude and unconfined recreation in a primitive setting and that may also contain historic features may be recommended for wilderness. Typical historic features that may be included are archeological sites, historic trails, travel routes, and minor structures.
- *Existing Developments* – Areas where evidence of people and their developments are obvious and are expected to remain are not suitable for wilderness designation. NPS development zones, as identified in the *General Management Plan*, *Apostle Islands National Lakeshore*, are not compatible with wilderness designation.



### WILDERNESS SUITABILITY CRITERIA

Under *National Park Service Management Policies 2001*, NPS lands will be considered suitable for wilderness if they are at least 5,000 acres or a sufficient size to make practicable their preservation and use in an unimpaired condition, and if they possess the following characteristics as identified in the Wilderness Act:

- The earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain.
- The area is undeveloped federal land retaining its primeval character and influence, without permanent improvements or human habitation.
- The area generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable.
- The area is protected and managed so as to preserve its natural conditions.
- The area has outstanding opportunities for solitude or a primitive and unconfined type of recreation.

Some have questioned whether the Apostle Islands meets the criteria for wilderness designation. It is true that the Apostle Islands are not a pristine landscape. Logging, quarrying, and farming have altered the landscape of many of the islands. However, in both the Wilderness Act and the Eastern Wilderness Act, Congress recognized that areas smaller than 5,000 acres and/or areas that have been altered by past human activity can still be considered for wilderness designation. The key questions that need to be answered are: 1) Will the area recover significantly to a natural state (not necessarily to its original state)? 2) Can the area be reasonably protected in the future as wilderness? In the case of the Apostle Islands National Lakeshore, the National Park Service determined in the 1989 *General Management Plan* that most of the park's land base was recovering and could be reasonably protected as wilderness.

## WILDERNESS STUDY PROCESS

In the summer and fall of 2001 the National Park Service began to seek public input on wilderness designation for the Apostle Islands. A public open house was held in Bayfield and meetings were held with agencies, tribes, and organizations. However, the formal public scoping process for the wilderness study, required for an environmental impact statement under the National Environmental Policy Act, began on October 12, 2001, when a notice of intent to prepare the wilderness study/environmental impact statement was published in the *Federal Register*. Letters were sent out at that time to the park's mailing list, requesting the public to identify the major issues and concerns regarding the wilderness study. The mailing list that the park staff routinely uses to invite public input on its plans and

studies was used as the starting point for the wilderness study mailing list. This list was supplemented with individuals and organizations who expressed interest in the study after it was publicized. Once the issues were understood, the study team identified six draft alternative proposals for designating wilderness in the park. A series of open houses and meetings were then held with the public and interested organizations during the summer of 2002 to gauge public reaction to the alternatives and determine which draft alternative was favored (see the "Consultation and Coordination" chapter for a list of these meetings). After analyzing this public input, the study team revised the alternatives, and dropped two of the preliminary alternatives. The four remaining alternatives (which have been renamed) and their

### TREATY AND PROPERTY RIGHTS PERTINENT TO THE WILDERNESS STUDY

Certain treaty and property rights apply to the alternatives being considered in the wilderness study:

**Treaty and Other Reserved Tribal Rights:** The Apostle Islands region is located within the heart of the ancestral homeland of the Ojibwe people. As such, the area's significance to Ojibwe traditions and culture cannot be overstated. Ojibwe treaty rights will continue to be honored under all of the alternatives being considered in the study – none of the alternative being considered would impede, prevent, or in any way negate treaty rights. Wilderness will not, and indeed cannot, affect the harvesting of plants or plant materials, hunting, fishing (including commercial fishing in Lake Superior) or trapping rights (although with appropriate consultation with affected tribal governments it may affect the manner in which treaty rights are exercised). For the Apostle Island National Lakeshore, these rights are reserved by the tribes and guaranteed by the United States in the treaties of 1842 and 1854, and have been affirmed in a number of court cases, including *State of Wisconsin vs. Gurnoe* and *Lac Courte Oreilles Band of Chippewa Indians vs. Voigt*. In addition, for those portions of the park that lie within the boundaries of their reservations, the Red Cliff Band of Lake Superior Chippewa Indians and the Bad River Band of the Lake Superior Tribe of Chippewa Indians enjoy a number of other rights of self-governance and self-determination that are reserved and protected in the Treaty of 1854 and other federal enactments.

**Other Valid Rights:** Wilderness will not affect the owners of various valid property rights under all of the alternatives being considered in the study. This includes county and township owned lands, mineral right owners, and individuals with use and occupancy rights. The National Park Service will continue to honor and respect the valid rights of these entities and individuals under all of the alternatives, as required under the provisions of the Wilderness Act and NPS management policies.

environmental impacts are presented in this final document. A preferred alternative was selected among these alternatives using a “Choosing By Advantages” (CBA) process (Suhr 1999). This process, which has been used extensively by government agencies and the private sector, evaluates different choices (in this case, the four alternatives) by identifying and comparing the relative advantages of each according to a set of factors. The factors used to evaluate the alternatives were

- ability to ensure long-term preservation of natural and cultural resources
- consistency with the spirit and intent of the Wilderness Act, Eastern Wilderness Act, other relevant legislation, NPS policy and the Wisconsin Legislature’s policy in donating its lands to the federal government
- ability to preserve and tell the stories of the Apostle Islands
- consistency with public comments received on the preliminary alternatives

The *Draft Wilderness Study / Environmental Impact Statement (EIS)* was published in July 2003. The National Park Service accepted comments on the draft study for over 90 days. Nine public meetings were held on the study throughout the region in July and August, and a formal public hearing was held in Ashland, Wisconsin, on August 27. The comment period ended on October 17, 2003.

After the comment period ended, the study team reviewed comments on the draft document, and determined if revisions needed to be made to address the comments. Based on the comments that were received, no major changes were

made to the alternatives in the draft document or to the analysis of environmental consequences. This final document includes responses to substantive written and oral comments on the draft document — comments that modify the preferred alternative, the range of alternatives, or the environmental analysis.

A minimum of 30 days after the publication of this final study / environmental impact statement, a record of decision will be prepared and published in the *Federal Register*. This record of decision will document what action the National Park Service intends to take regarding a wilderness proposal for the Apostle Islands National Lakeshore.

If the decision is made to propose wilderness, and the NPS Director concurs, a wilderness proposal will be sent to the Assistant Secretary of Fish and Wildlife and Parks and the Secretary of the Interior, who may revise or approve the proposal. The Secretary may then forward a wilderness recommendation to the President. The President may approve or revise the recommendation and then transmit his recommendation to Congress for consideration. Congress may enact legislation needed to include the area within the national wilderness preservation system as “designated” and/or “potential” wilderness.

It is important to note that under NPS policies the 97% of lands within the park that have been found suitable for wilderness designation will continue to be managed as *de facto* wilderness until Congress takes action on a wilderness recommendation or the Secretary of the Interior recommends to the President that no lands be recommended to Congress for designation as wilderness.

## PRIMARY ISSUES AND CONCERNS

Several major issues and concerns regarding designating or not designating wilderness were raised prior to and during the public scoping period by citizens, local governments, state agencies, and tribes. These issues and concerns were expressed at a public open house, held on July 25, 2001, in Bayfield, mailed in via comment forms and the Internet, and voiced at several meetings members of the planning team held with agencies and organizations during the summer of 2001.

It is important to note that the issues and concerns listed below are the *perceptions* of those who commented during the scoping period. They do not necessarily reflect how the National Park Service would actually manage wilderness. For more details on wilderness management, see the *NPS Management Policies 2001*, which are available on-line at [www.nps.gov/apis/wstudy.htm](http://www.nps.gov/apis/wstudy.htm).

### 1. IMPACTS OF POTENTIAL NEW DEVELOPMENTS ON THE ISLANDS

The most frequent concern raised by individuals and conservation groups was the possibility that in the future new developments could be built or other actions taken that would change the character of the park. Many of these people wanted to ensure that the islands be maintained as they are for present and future generations. Concerns were raised that without the protection provided by wilderness, there could be fewer opportunities for those seeking solitude and quiet, primitive recreational experiences, and that adverse impacts could occur to the islands' wildlife and other resources.

### 2. ACCESS TO APOSTLE ISLANDS NATIONAL LAKESHORE (MOTORBOATS AND SAILBOATS)

Another issue frequently raised by individuals and local governments was access to the park. People were concerned that wilderness would "lock up" the park, preventing or reducing access and use of the islands and preventing motorboat access. Local residents were worried that they would not be able to use the islands. People were apprehensive about wilderness extending out into the ¼-mile water area surrounding the islands. Concerns were expressed that wilderness designation would prevent docks from being used, prevent people from snowmobiling by the islands to ice fish, result in restrictions being placed on anchorages, and prevent people with disabilities from accessing the islands. This issue was considered but was not addressed further for the reasons outlined at the end of this chapter.

### 3. CHANGES IN VISITOR USES AND EXPERIENCES

Another major concern was how the visitor experience would change as a result of wilderness designation. A fear was expressed that wilderness would result in more and more restrictions being placed on uses of the islands over time, which would alter the experience people now have. Some expressed the opinion that with wilderness, visitors would have less freedom to do what they want, whenever and wherever they want, compared to the present. Other concerns were what effect wilderness would have on hunting and trapping and commercial fishing.

#### **4. IMPACTS TO THE LOCAL COMMUNITIES AND ECONOMY**

A fourth major concern was what effect wilderness designation would have on the local communities and their economies. Concerns were expressed that wilderness designation would threaten the tourism industry, which is vital to the area and has shaped itself around the park's current management approach. This issue was considered but was not addressed further for the reasons outlined at the end of this chapter.

#### **5. IMPACTS ON NATIVE AMERICAN TREATY RIGHTS**

Representatives of Native American tribes expressed concerns that wilderness might interfere with their treaty and other reserved rights. The tribes noted that the islands are historically and culturally significant for the Ojibwe and that their members rely upon the natural resources found in and around the park for subsistence, medicinal, cultural, religious and economic purposes as they have for many generations. Specifically, the tribes were concerned that they continue to have access to the resources they need for these purposes and that the park be maintained and preserved in a manner that is consistent with these needs as required by applicable treaties, other federal enactments, and the federal government's trust responsibility of good faith and fair dealings toward tribes and their members. Specific concerns included the possibility of banning commercial fishing and

motorized access to the islands, particularly for fishing purposes or to ensure that elders are able to access the natural resources that they need. These issues were considered and are addressed as pre-existing tribal treaty and other reserved rights, as outlined in the text box in the previous "Wilderness Study Process" section.

#### **6. PROTECTION OF CULTURAL RESOURCES**

Concerns were expressed that wilderness designation would restrict actions that can be taken to maintain and protect cultural resources, such as the quarries and old farmsteads. Some people believe that wilderness designation would increase the temptation to remove and obliterate signs of past human use. Specific details regarding the management of cultural resources in wilderness are beyond the scope of this wilderness study and are more appropriately considered in a subsequent wilderness management plan. However, this concern is generally addressed in the "Environmental Consequences" chapter of this environmental impact statement.

#### **7. PARK OPERATIONS**

Concerns were raised that wilderness designation would reduce the flexibility of park managers to use machinery and other motorized equipment to manage resources and visitors in wilderness. This could reduce the productivity of staff, increase the number of staff needed to complete a task, and increase costs.

## **IMPACT TOPICS CONSIDERED IN THIS ENVIRONMENTAL IMPACT STATEMENT**

To focus the environmental impact analysis in this document, and to ensure that the alternatives were evaluated against relevant topics, the study team selected specific impact topics for further analysis and eliminated others from evaluation. The impact topics selected for analysis in this document, listed below, were based on public and other agency concerns identified during scoping, federal laws, regulations and orders, and National Park Service Management Policies 2001 (NPS 2000). A brief rationale for selecting each impact topic is provided below.

### **NATURAL RESOURCES (GENERAL)**

This topic includes geology and coastal processes, soils, water quality, vegetation, and wildlife. None of the alternatives being considered would alter the park's soils, biotic communities, vegetation or wildlife populations, or other natural resources. Wilderness designation would not substantially affect either the management of natural resources, such as vegetation and wildlife in the park, or uses within the park that could affect these resources. In all of the alternatives the National Park Service would continue to protect and conserve native vegetation, wildlife, and other natural resources as required under the NPS Organic Act and *NPS Management Policies 2001*. However, in implementing the alternatives there is the potential that future developments could occur in those areas that are excluded in the various wilderness

proposals, which could affect the park's natural resources.

Any loss or alteration of coastal processes, soils, vegetation, wildlife, etc., would be of concern to visitors, the general public, and NPS managers. This impact topic addresses issue #1.

### **CULTURAL RESOURCES (ARCHEOLOGICAL RESOURCES, HISTORIC STRUCTURES, ETHNOGRAPHIC RESOURCES, AND CULTURAL LANDSCAPES)**

Wilderness designation could affect the park's cultural resources, including archeological and ethnographic resources, historic structures, and cultural landscapes. In all of the alternatives the National Park Service would continue to protect and conserve cultural resources as required under the National Historic Preservation Act, Archaeological Resources Protection Act, NPS Organic Act and *National Park Service Management Policies 2001*. But like the natural resources, in the implementation of the alternatives there is the potential that future developments could occur in those areas that are excluded in the various wilderness proposals, which could affect the park's cultural resources. Any loss or alteration of archeological sites, historic structures, cultural landscapes, and ethnographic resources would be of concern to visitors, the general public, and NPS managers. This impact topic addresses issue #6.

## **WILDERNESS RESOURCES (INCLUDING THE VISITOR WILDERNESS EXPERIENCES)**

The primary purpose of this study is to determine whether or not wilderness should be proposed for Apostle Islands National Lakeshore. A wilderness type experience is important to many visitors who come, or want to come, to the park. Director's Order 41 ("Wilderness Preservation and Management") and *National Park Service Management Policies 2001* require that the wilderness qualities found in 97% of the park's land base be protected until Congress takes action on a wilderness recommendation. Thus, the park's wilderness resources are important to consider in the management of the park. During the scoping period many people emphasized the need to protect the park's wilderness resources. Any decreases in opportunities for solitude, the apparent naturalness of the park, and opportunities for primitive, unconfined recreation would be of concern to some visitors, managers, and the public. This impact topic addresses issue #2.

## **VISITOR NONWILDERNESS EXPERIENCES**

This topic relates to the quality of those visitor experiences not related to wilderness, including the range of activities available to visitors. The purpose of Apostle Islands National Lakeshore is "to conserve and develop for the benefit, inspiration, education, recreational use, and enjoyment of the public." Any actions

that would diminish the quality of visitors' experiences in the park would be important to visitors and managers — changes in available visitor opportunities, the character of the visitor experience, or what activities are and are not permitted would be of concern to many people. During the scoping period many people expressed concerns about the impacts of wilderness designation on their experience in the park. This impact topic addresses issue #2.

## **PARK OPERATIONS**

This topic concerns park staffing levels and workloads, maintenance activities, costs, planning needs, and the ability to consider facilities in the future to support island administrative operations. Although much of the park could be designated as wilderness under the alternatives, most island operations would not be affected because major developments would not be included in any of the wilderness proposals. But wilderness designation could increase some workloads and staff needs and decrease other needs. Proposed management actions, such as administrative use of motorized equipment or mechanical transport, would need to be evaluated to determine if they are consistent with NPS wilderness policies before they could be authorized. Any changes in park operations due to wilderness (e.g., changes in maintenance activities, ranger patrols, or costs) may be of concern to both NPS staff and visitors. This impact topic addresses issue #7.

## **IMPACT TOPICS CONSIDERED BUT NOT ANALYZED IN DETAIL**

Several potential impact topics were dismissed because they would not be affected, or the potential for impacts under all of the alternatives would be negligible. These topics are listed below, with an explanation of why they were not considered in detail.

### **PRIME AND UNIQUE AGRICULTURAL LANDS**

There are no prime or unique agricultural soils within the boundaries of Apostle Islands National Lakeshore (NPS 1989).

### **AIR QUALITY**

In all of the alternatives the National Park Service would continue to protect and conserve air quality as required under the NPS Organic Act and *NPS Management Policies 2001*. None of the alternatives being considered would substantially alter the park's air quality. Wilderness designation would not substantially affect either the management of air quality in the park or uses within the park that could affect air quality.

### **FLOODPLAINS AND WETLANDS**

None of the alternatives would alter the park's wetlands and floodplains. Wilderness designation would not substantially affect either the management of wetlands and floodplains in the park or uses within the park that could affect wetlands and floodplains. In all of the alternatives the National Park Service would continue to protect and conserve

the park's wetlands and floodplains as required under the NPS Organic Act, Executive Order 11988 (Floodplain Management), the NPS "Floodplain Management Guideline," Executive Order 1190 ("Protection of Wetlands"), NPS Director's Order 77-1 ("Wetland Protection"), and *NPS Management Policies 2001*. If potential developments were to be built in areas not proposed for wilderness, the National Park Service would avoid building facilities in floodplains (except as permitted under the floodplain guidelines) or wetlands. If a trail was to be built that passes through a wetland, and that wetland could not be avoided, the project would be analyzed to minimize impacts to the wetland.

### **FISH**

The Apostle Islands area is important for commercial and recreational fishing. However, none of the alternatives propose wilderness for the waters of Lake Superior or would result in changes that would affect the fish populations within the park portion of Lake Superior. Recreational and commercial fishermen would continue to be able to harvest fish within the boundaries of the park under all of the alternatives, subject to the regulations of the Wisconsin Department of Natural Resources. No changes would occur to the management of the commercial and recreational fishery or commercial fishing by Native Americans within the boundaries of the park solely due to wilderness designation under any of the alternatives.



## THREATENED & ENDANGERED SPECIES

Apostle Islands National Lakeshore supports populations and/or habitats for several federal and state listed threatened and endangered species (see appendix B). Federally endangered timber wolves (*Canis lupus*) have begun to utilize portions of the mainland unit, federally threatened bald eagles (*Haliaeetus leucocephalus*) nest in the park, and Long Island and the Michigan Island sandcape have been designated as critical habitat for the federally and state endangered piping plover (*Charadrius melodus*). The Apostle Islands also provide important habitat for five state endangered plants (butterwort (*Pinguicula vulgaris*), moonwort (*Botrychium lunaria*), mountain cranberry (*Vaccinium vitis-idaea*), satiny willow (*Salix pellita*), lake cress (*Armoracia lacustris*)), and 12 state threatened plants. None of the alternatives would affect threatened and endangered species or habitats that occur within the park. Wilderness designation would not substantially affect either the management of threatened and endangered species in the park or uses within the park that could affect these species and their habitats. In all of the alternatives the National Park Service would continue to protect, conserve, and restore threatened and endangered species populations in the park as required under the Endangered Species Act, NPS Organic Act, and *NPS Management Policies 2001*. If potential developments were to be proposed or development were to be proposed in nonwilderness areas, the National Park Service would seek to avoid adverse effects on listed federal and state species and their habitats in consultation with the U.S. Fish and Wildlife Service and the Wisconsin Department of Natural Resources.

## LIGHTSCAPE

Under the NPS Organic Act and *NPS Management Policies 2001*, the National Park Service is required to protect to the greatest extent possible the natural light-scapes (i.e., night sky) of the park. In particular, the policies call for the National Park Service to protect natural darkness. None of the alternatives in this wilderness study would alter the park's lightscape. Wilderness designation would not substantially alter activities within the park that could modify the lightscape. It is also considered likely that a potential development that may be built in a nonwilderness area on the islands would have only a negligible impact on the night sky. Most potential developments, such as campsites, trails, and picnic areas, would not have artificial light sources. If lights were needed, they would be localized, affect only a small area, and be designed to not adversely affect the lightscape.

## SOUNDSCAPE

Under the NPS Organic Act, Director's Order 47 ("Soundscape Preservation and Noise Management"), and *NPS Management Policies 2001*, the National Park Service is required to protect to the greatest extent possible the natural soundscape. None of the alternatives in this wilderness study would alter the park's soundscape. Wilderness designation would not substantially affect activities within the park that could alter the soundscape. Although a potential development could be built in an area not proposed for wilderness, increasing noise levels in that area, it is not likely that a substantial change would occur in the park's soundscape. The primary source of noise in the park would continue to be motorboats and people at the existing primary developments, which

would occur regardless of whether or not wilderness was designated.

## **MUSEUM OBJECTS**

Museum objects are manifestations and records of behavior and ideas that span the breadth of human experience and depth of natural history. None of the proposed alternatives have potential to affect museum objects.

## **PUBLIC HEALTH AND SAFETY**

None of the alternatives would result in identifiable risks to human health and safety. Wilderness designation would not change visitor activities or management activities that would substantially alter the potential for threats to the health and safety of people in the park – regardless of whether or not wilderness would be designated, Lake Superior would pose the same risks for people who paddle, sail, or motor to the islands.

## **ACCESS TO APOSTLE ISLANDS NATIONAL LAKESHORE**

None of the alternatives in this study would affect access to the park by any currently legal means, including motorboats and sailboats — all currently permitted access methods would continue regardless of whether or not wilderness is designated in the park. None of the alternatives would result in the removal of public docks, or prohibit boats from being beached on the islands, which also could affect access to the islands.

## **SOCIOECONOMIC ENVIRONMENT**

Apostle Islands National Lakeshore affects local businesses and the economy of

Bayfield and other communities in the area. Any actions that would alter visitor use levels or visitor use patterns would be of concern to many local businesses, including marinas, lodges, motels and restaurants, supply stores, guides, outfitters, and concessioners. During the scoping period many people expressed concern that wilderness designation would adversely affect the local economy. The two-county economy would be negatively affected only if designating wilderness (and managing these areas as wilderness) would cause negative changes in the numbers of visitors and/or their expenditure patterns, to the extent that individuals or firms would experience a loss of jobs and/or income. Because none of the alternatives would affect existing docks or access to the islands, no changes would be expected in overall visitor use levels or use patterns, and thus no changes would be expected in visitor expenditures related to the park.

Also, NPS policy is to manage parklands and waters that have the potential for wilderness designation in a manner that preserves the wilderness potential and qualities of these resources. The islands being considered for designation as wilderness are currently being, and have been, managed to preserve wilderness values. Consequently, very little change in management activities and allowable types of use would occur in these areas of the park. As a result, official recognition and legal protection of wilderness in the park would not cause negative impacts to the local economy.

There are no studies that support the hypothesis that negative impacts would occur to the local and regional economy as a result of the alternatives – there is a lack of evidence to substantiate claims that designating wilderness actually harms a

local county economy. Thus, the belief that there is a connection between wilderness designation and negative economic impacts, such as a loss of jobs or income within the local region, has not been substantiated. On the contrary, several research studies indicate that wilderness is a positive (or at least neutral) factor supporting the growth of local economies — there is evidence that wilderness positively correlates with increased economic growth and increasing populations in rural counties (Duffy-Deno 1998, Lorah 2000, Power 2000, Rudzitis and Johnson 2000).

## LAND USE

There are no local land use plans that would affect the islands being considered for wilderness designation in this document. Wilderness designation under any of the alternatives also would not induce any changes in land use, or increase pressure for development, on the mainland adjacent to the park.

## INDIAN TRUST RESOURCES

Secretarial Order 3175 requires that any anticipated impacts to Indian trust resources from a proposed project or action by Department of Interior agencies be explicitly addressed in environmental documents. The lands and waters comprising Apostle Islands National Lakeshore, including the lands on the mainland that are part of the Red Cliff Indian Reservation (and possibly Long Island in relation to the Bad River Indian Reservation), are not held in trust by the Secretary of the Interior for the benefit of Indians due to their status as Indians. However, this is not to say that the tribes do not have certain other rights to the lands and waters in the park. Those rights will continue to be honored regardless of

the alternatives being considered in this wilderness study.

## ENVIRONMENTAL JUSTICE

Executive Order 12898 requires federal agencies to identify and address disproportionately high and adverse human health or environmental effects on minority and low-income populations. Minority or low income populations would be treated the same way under all of the alternatives considered in this study. None of the alternatives being considered would have a disproportionately high and adverse effect on any minority or low-income population or community. This conclusion is based on the following information:

- The wilderness proposals in the alternatives would not result in any identifiable adverse human health effects. Therefore, there would be no direct, indirect, or cumulative adverse effects on any minority or low-income population or community.
- The alternatives would not trump or take precedence over Native American treaty rights – Native American tribes with treaty-reserved rights would continue to be able to hunt, fish, trap, and gather within Apostle Islands National Lakeshore, consistent with those rights.
- No natural resource adverse impacts were identified due to the alternatives that would significantly and adversely affect minority or low-income populations or communities.

- The alternatives would not result in any identified effects that would be specific to any minority or low-income community.
- The study team actively solicited public comments during the development of the wilderness study and gave equal consideration to all input from persons, regardless of age, race, sex, income status, or other socioeconomic or demographic factors.
- During the study process park staff consulted and worked with the Red Cliff and Bad River Bands of the Lake Superior Chippewa, and the Voigt Intertribal Task Force of the Great Lakes Indian Fish and Wildlife Commission, and will continue to do so in cooperative efforts to improve communications and resolve any problems that occur. The study team did not identify negative or adverse effects due to wilderness designation that would disproportionately and adversely affect these Native Americans.
- No impacts were identified to the socioeconomic environment due to the alternatives that would substantially alter the physical and social structure of the nearby communities.

## **NATURAL OR DEPLETABLE RESOURCE REQUIREMENTS AND CONSERVATION POTENTIAL**

None of the alternatives being considered would result in the extraction of resources from the park. Under all of the alternatives ecological principles would be applied to ensure that the park's natural resources were maintained and not impaired.

## **ENERGY REQUIREMENTS AND CONSERVATION POTENTIAL**

None of the alternatives would result in a measurable change in energy consumption compared to current conditions. Depending on the approaches used to satisfy NPS wilderness management policies, the park's use of energy could slightly decline due to reduced use of mechanized equipment in the wilderness areas in alternatives B, C, and D. The use of energy could also slightly increase due to the need to take more trips to the islands if crews used hand tools to maintain wilderness facilities such as trails and campsites. However, the change in energy consumption due to these actions in alternatives B, C, and D would be expected to be negligible compared to the overall energy consumption of the park.

The National Park Service would pursue sustainable practices whenever possible in all decisions regarding park operations, facilities management, and developments in Apostle Islands National Lakeshore, as called for in *NPS Management Policies 2001*. As with the existing island facilities, any new future developments in the nonwilderness areas would be powered by solar electrical systems or other alternative energy sources in all of the alternatives.

### **POSSIBLE TOPICS FOR A FUTURE WILDERNESS MANAGEMENT PLAN**

If wilderness is designated in the park, a wilderness management plan eventually will be prepared. Listed below are some of the topics such a plan will need to address:

- Management of vegetation to protect cultural resource sites
- Management of fire, non-native species, threatened and endangered species, and other natural resource concerns
- Stabilization of cultural resource sites
- Visitor use management
- Maintenance and development of trails
- Construction of other new visitor facilities
- Maintenance and development of new campsites
- Maintenance and development of administrative facilities
- Establishment of a procedure to determine what are the minimum requirement for administrative facilities normally prohibited in wilderness
- Providing access for people with disabilities
- Management of valid existing rights within the wilderness
- Administration of scientific activities, including research, within the wilderness
- Interpretation and education
- Emergency services

## **WILDERNESS ALTERNATIVES**



## INTRODUCTION

This chapter describes the National Park Service’s proposal for designating wilderness in Apostle Islands National Lakeshore (the preferred alternative), and three alternative proposals. The first section in this part describes which segments of the park were considered not suitable for wilderness in all of the alternatives and why. Then alternative A, the no wilderness alternative (“no-action”) is presented, which provides a baseline for comparing the effects of the other alternatives. Next, alternatives B, C, and D are described, which present alternative wilderness proposals. The alternatives vary in the locations where wilderness would be proposed, as well as in the acreage amounts.

For alternatives B, C, and D maps and general descriptions are provided that show where wilderness would be proposed in the alternatives. Each alternative also includes a brief rationale for why wilderness would be proposed in that particular configuration. At the end of this part there is a description of alternatives that were considered by the study team initially but dropped from further analysis. There are two tables at the end of the chapter: table 2 shows which islands would be included as wilderness in each of the alternative; table 3 summarizes the impacts of each alternative.



## AREAS CONSIDERED NOT SUITABLE FOR WILDERNESS

One of the first tasks of the study team in developing alternatives was to identify those areas in the park that clearly do not meet the Wilderness Act suitability criteria and therefore will not be considered in any of the wilderness study alternatives (see the text box on wilderness suitability criteria on page 10). Eight areas or types of areas have been found to be clearly not suitable as wilderness. Most of the areas listed below were excluded because they are primary visitor attractions with a lot of people, have obvious signs of development, or are being managed for human activities. Areas with use and occupancy structures and life estates currently have nonconforming uses, but potentially could be suitable as wilderness in the future, and were not included in this list.

### WATERS AND SUBMERGED LANDS OF LAKE SUPERIOR UP TO THE HIGH-WATER MARK

**Rationale for not considering:** The Apostle Islands National Lakeshore boundary encompasses both waters and submerged lands of Lake Superior. The state of Wisconsin owns the submerged lands and may own the water column (there are legal questions about this), so the waters likely do not qualify for consideration under the Wilderness Act criteria. In addition, there is the question of whether it would be possible to manage a ¼-mile wilderness boundary: it would be extremely difficult for most visitors and managers to tell when they are within or outside the ¼-mile limit.

Furthermore, inclusion of the waters would do little, if anything, to enhance the wilderness experiences of the islands, given that motorboats would still operate outside the ¼-mile boundary.

It is important to note that beaches on the islands, which are below the ordinary high- water mark, fall in this category and are *not* included in the wilderness proposals in this wilderness study. This means that under all alternatives boats could continue to be beached on the islands and would be outside all the wilderness proposals.

### PUBLIC DOCKS ON THE ISLANDS

**Rationale for not considering:** The public docks within Apostle Islands National Lakeshore are analogous to parking lots and trailheads in traditional national parks. They are vital access points for visitors, are designed to accommodate motorized watercraft, and visitors necessarily congregate near them in relatively high numbers. In addition, the vast majority of each dock lies upon the submerged lands discussed above. For all of these reasons, each public dock and all land areas within a radius of at least 100 yards of the end of each dock, or the maximum perimeter that encompasses all existing developments in the vicinity of a dock, were not considered suitable for wilderness. Public docks are located at Basswood, Oak, Michigan, Stockton, Manitou, Outer, Rocky, South Twin, Otter, Devils, Long, Raspberry, and Sand Islands.

The nonwilderness areas around the docks were modified from the June 2002 alternatives workbook to better define the boundaries of these areas on each island and to ensure that developments associated with the docks were completely incorporated into the nonwilderness areas. On some islands the nonwilderness areas were increased, while on others the nonwilderness areas were decreased.

## THE WILDERNESS BOUNDARY AND LAKE SUPERIOR

For most bodies of water, the state of Wisconsin defines the term "ordinary high-water mark" to mean

"The point on the bank or shore up to which the water, by its presence and action or flow, leaves a distinct mark indicated by erosion, destruction of or change in vegetation or other easily recognizable characteristic."

In other words, it is a dynamic line based upon the actions of water within the particular lake or stream bed in which it lies, rather than upon a static elevation. The primary advantage of such a definition is that it is based on something that is often very visible (such as a vegetation line or a dune), which the public can readily identify themselves. In the case of Lake Superior, however, the state of Wisconsin equates the ordinary high-water mark to a static elevation: 602 feet above sea level. Some have pointed out that under such a definition, the beaching of boats would be impossible at any time that lake levels exceed 602 feet.

Due to this technicality, the National Park Service has chosen to use the term "high-water mark," as opposed to "ordinary high-water mark," when referring to the boundary between wilderness and the lake. It needs to be emphasized that whenever the term "high-water mark" is used in this document, it is defined in the dynamic, classical sense, rather than the static, elevation-based sense. Under such a definition, lake levels can never exceed the high-water mark, and any area where a boat could be beached would be outside wilderness, regardless of lake levels.

Another consequence of adopting this definition is that the wilderness boundary around each island would be "elastic" to a certain degree. As water levels rise, the wilderness boundary retreats a short distance away from the lake. As water levels decline, the boundary moves outward, although ultimately it will stop when it reaches the boundary with the state-owned lake bed. As shorelines erode away, the boundary retreats inward. As beaches adjacent to wilderness build up, the wilderness boundary incorporates those portions that rise above the high-water mark. This type of boundary is ideally suited for the dynamic nature of islands within Lake Superior, and it ensures that wilderness will never extend out into the lake itself.

The beaching of boats is a long-established tradition in the Apostle Islands, and it is the intent of the NPS to allow this activity to continue in the future, regardless of lake levels.

## MAINLAND UNIT

**Rationale for not considering:** The mainland unit was not considered suitable due to its geography and the presence of roads and developments. Both Little Sand Bay and the Meyers Beach area, at either end of the mainland unit, are major visitor use areas, with visitor support facilities, historic developments, and roads. Between these areas there are many four-wheel drive roads, which are used by local residents and visitors to varying degrees. It is not possible to close all of these roads—these roads are under township jurisdiction, and at least one of them, the Big Sand Bay Road, must be used to access lands outside the park’s boundary. There are also a couple of nonfederal tracts in the unit. Consequently, the narrow mainland unit (often only ¼-mile wide) is fragmented by developments, roads, and nonfederal land. Thus, despite the fact that the 1989 *General Management Plan* found the area “may be suitable,” it not feasible to manage the mainland’s undeveloped areas as wilderness.

## LIGHT STATIONS AND ADJOINING CULTURAL LANDSCAPES

**Rationale for not considering:** The light stations and surrounding environs are major visitor attractions with many signs of people. They clearly do not meet the Wilderness Act criteria. These exclusions include the historic clearings around the

lighthouses, which are part of the cultural landscapes.

## HOUSING/ADMINISTRATION AREAS ON STOCKTON, ROCKY, SAND, AND OAK ISLANDS

**Rationale for not considering:** These areas all have multiple developments and many signs of people. There are no plans to remove any of these facilities.

## MANITOU ISLAND FISH CAMP

**Rationale for not considering:** This historic site is a major visitor attraction, which under NPS policies should not be recommended for wilderness designation. The area is being managed to preserve human activities.

## SOUTHEAST TIP OF SAND ISLAND

**Rationale for not considering:** This area has many historic residences, structures, and developments, many of which will be maintained for the foreseeable future.

## WEST BAY CLUB ON SAND ISLAND

**Rationale for not considering:** This historic two-story structure, with outbuildings, is clearly a sign of past human activity. The structures will be maintained for the foreseeable future.

## ALTERNATIVE A: NO WILDERNESS (NO-ACTION ALTERNATIVE)

This alternative, which is required under the National Environmental Policy Act, provides a baseline for comparing the changes and impacts of the other action alternatives. Under this alternative no wilderness would be proposed for Apostle Islands National Lakeshore. (This was alternative 5 in the June 2002 workbook.) If this alternative was selected, no lands would be recommended for wilderness in the park. Consequently upon congressional approval, the National Park Service would no longer be required to protect the area's wilderness values.

However, for at least the short term the National Park Service would continue to protect and maintain the park's wilderness characteristics indirectly through the existing zoning framework. The lands in the park's natural zone would continue to be managed to preserve natural features, including many wilderness characteristics, as directed in the 1989 *General Management Plan*. Existing recreational uses and developments would continue.

No major changes in resource management could occur and no new major developments could be built in the natural zone.

It is important for readers to keep in mind that alternative A would *not* ensure that existing conditions and management would continue in the future. In the long term it is possible that alternative A could be a departure from how the National Park Service has managed Apostle Islands National Lakeshore in the past. The National Park Service would no longer be bound to protect and manage most of the park's land base as *de facto* wilderness in this alternative. As a result, when the existing general management plan is revised or a new general management plan is adopted, the management directions for the park could change, which could result in less protection for wilderness resources in parts of the park — a new plan could propose new developments or management actions that are not currently permitted.

## ALTERNATIVE B (MAXIMIZE WILDERNESS)

Alternative B would exclude only the areas determined to be not suitable in all of the alternatives (i.e., the waters and submerged lands of Lake Superior, all public docks on the islands, the mainland unit, all light stations and cultural landscapes, the Manitou Island fish camp, housing/administrative areas at Stockton, Rocky, Oak, and East Bay of Sand Island, and the southeast tip and West Bay Club on Sand Island). Of all the alternatives, alternative B would be most similar to how Apostle Islands National Lakeshore is currently being managed because 97% of the park's land base is being managed as *de facto* wilderness. Altogether, approximately 39,500 acres of the park's 42,160-acre land base (94%) would be proposed as wilderness under alternative B (see the alternative B map on page 31). This is the equivalent of 57% of the entire park (69,372 acres), if one considers the waters as well as the lands within the park boundary.

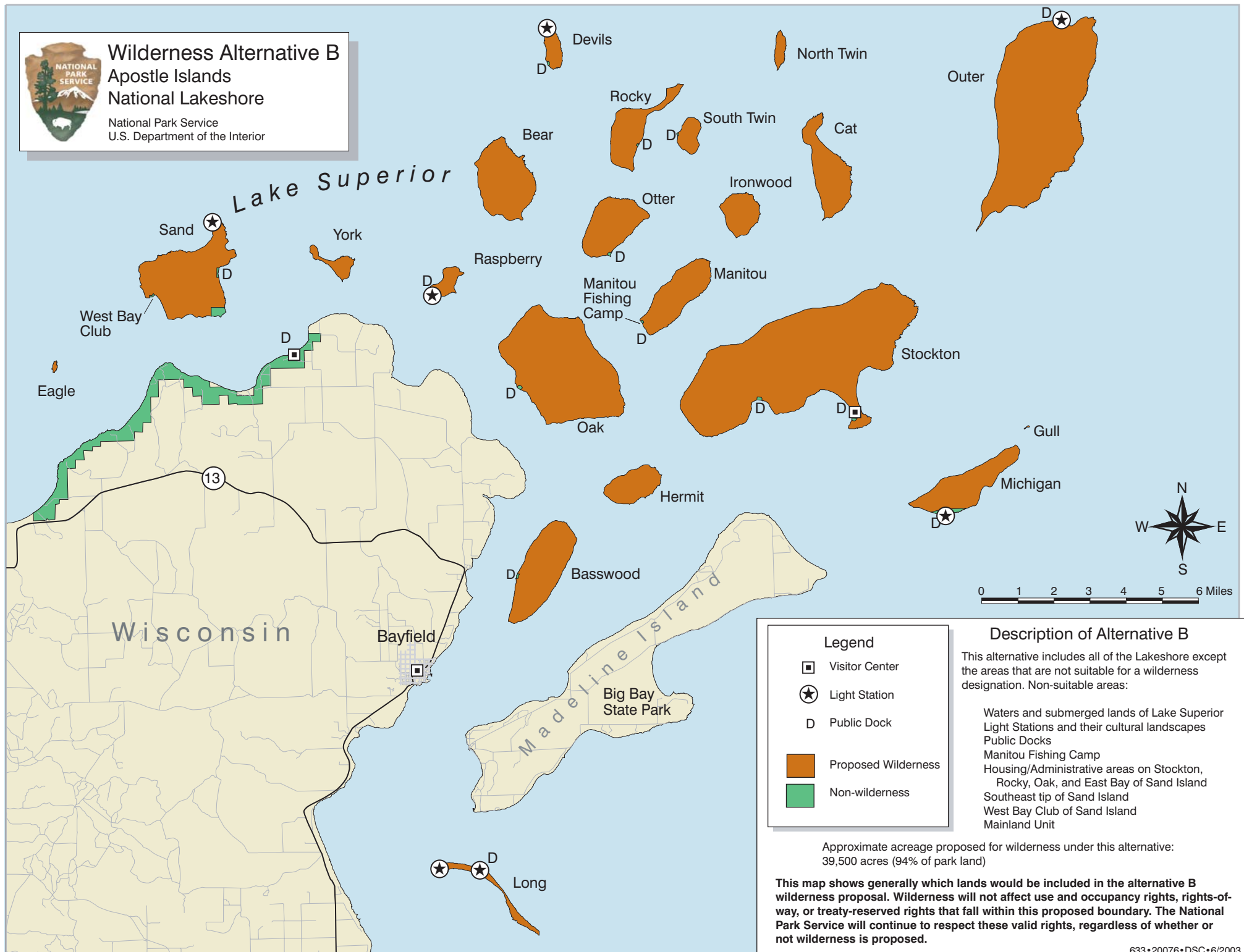
Under alternative B the following areas would be potential wilderness: the nonfederal tracts on Sand and York Islands and the use and occupancy reservations on Sand, Rocky, and Bear Islands (except for those reservations on Sand Island that have been found to be unsuitable for wilderness designation). Although these areas are identified as potential wilderness, the National Park Service would continue to honor and respect all of these valid rights as required under the provisions of the Wilderness Act and NPS management policies.

This alternative was alternative 1 in the June 2002 alternatives workbook. Except for changes that were made to the exclusion areas around the docks (which also apply to alternatives C and D), no changes were made to the original alternative.



## Wilderness Alternative B Apostle Islands National Lakeshore

National Park Service  
U.S. Department of the Interior



Back of map

## ALTERNATIVE C: (PREFERRED ALTERNATIVE AND ENVIRONMENTALLY PREFERRED ALTERNATIVE)

Alternative C is the National Park Service's preferred alternative for designating wilderness in Apostle Islands National Lakeshore. Altogether, approximately 33,500 acres of the park's 42,160-acre land base (80%) would be proposed as wilderness under alternative C. This is the equivalent of 48% of the entire park (69,372 acres), if one considers the waters as well as the lands within the park boundary.

This alternative is intended to permanently protect most of the park's natural, cultural, and wilderness resources. It also is intended to ensure that there will be outstanding opportunities for people to learn both the stories of the people who settled and altered these islands and the story of the "rewilding" of the park — a term that environmental historian James Feldman uses to describe the process whereby the park's historical "wilderness" qualities are gradually returning (Feldman and Mackreth 2003).

To ensure that future opportunities for interpreting the environmental history of the Apostle Islands are preserved, Basswood and Sand Islands would *not* be included in this wilderness proposal. These two islands are relatively close to the mainland and have a representative cross-section of all the types of cultural resources found in the park. They are ideally suited for the expansion of interpretive opportunities, such as some limited facilities to help visitors understand the historical and natural processes on the Apostle Islands. Wilderness designation would likely preclude some of these facilities and foreclose potential interpretive opportunities.

Alternative C also strives to minimize the number of small, fragmented areas of wilderness or nonwilderness. As an example, rather than excluding numerous small locations along the southern shore of Stockton Island, this alternative excludes two areas that encompass all of these sites. Some areas were excluded because of the potential for expanding visitor facilities (consistent with the *General Management Plan*), but again, always with an eye toward minimizing small isolated pockets of wilderness or nonwilderness.

Long Island also was not included in this wilderness proposal for several reasons. The island has a high level of day use, which combined with the narrow nature of the island, limits opportunities for solitude during the summer. In addition, the island would have required at least two areas of nonwilderness (the areas surrounding the two lighthouses) and possibly a third, making the boundary complex and the potential for wilderness acreage smaller. Finally, the Bad River Band of Lake Superior Tribe of Chippewa Indians did not support wilderness designation for Long Island because they believe it may be within their reservation and do not want an additional designation of the island to potentially interfere with that claim.

The following areas would be proposed as wilderness under alternative C: all of Bear, Cat, Eagle, Gull, Hermit, Ironwood, North Twin, and York, and most of Michigan, Otter, Outer, Raspberry, Rocky, South Twin, Devils, Manitou, Oak, and Stockton Islands (see the alternative C map on page 35).



Under alternative C the following areas would be potential wilderness: the nonfederal tract on York Island, and the use and occupancy reservations on Rocky and Bear Islands. Although these areas are identified as potential wilderness, the National Park Service would continue to honor and respect all of these valid rights, as required under the provisions of the Wilderness Act and NPS management policies.

Alternative C reflects the same general goals and direction of alternative 3 in the June 2002 alternatives workbook. However, the alternative has been modified to refine the wilderness boundaries so they are more easily identifiable on the ground, to enhance opportunities for future interpretation of significant cultural resources (which were not necessarily provided for in the original alternative 3), and in some cases to reduce the fragmentation of wilderness and nonwilderness areas on islands. Among the major changes that were made to the original alternative 3:

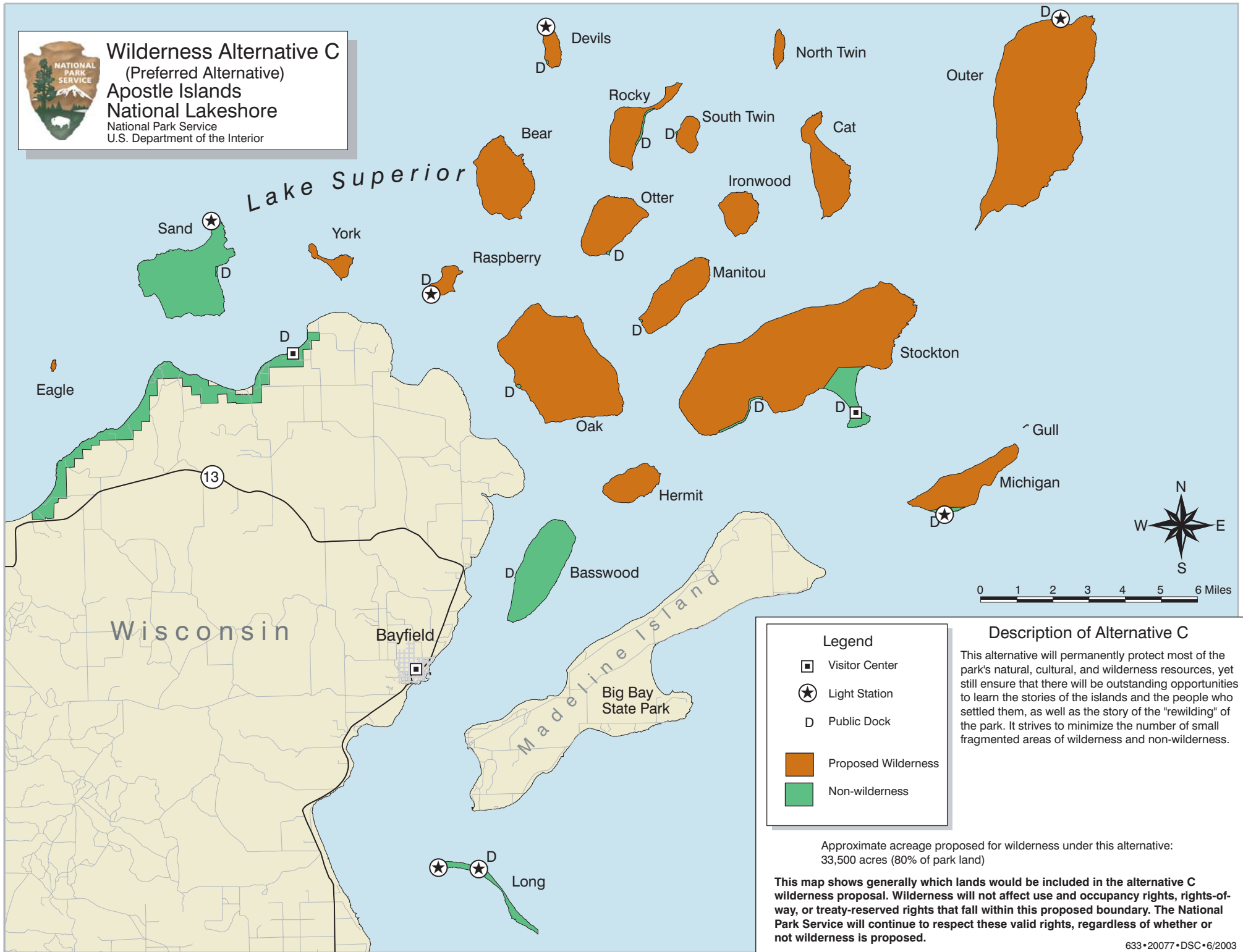
- All of Sand Island was excluded from proposed wilderness. The island still has extensive evidence of human occupation. The change would reduce fragmentation and make the island easier to manage, provide more possibilities to tell stories about the island and to interpret resources in ways that wilderness would not allow, and keep open the possibility of the island accommodating additional development to provide for increased use.

- The nonwilderness portion of Manitou Island was reduced. This change provides a better, more discernible boundary, consistent with how other cultural resources are treated under the alternative
- The nonwilderness portion of Rocky Island was increased, incorporating a former fishing community along the east shore of the island. (This change provides more possibilities to interpret a significant cultural resource, beyond what is allowable in a wilderness area, and keeps open the possibility of providing additional visitor developments to accommodate increased use in one of the park's most popular areas.
- The nonwilderness area on Stockton was decreased, with two areas, Quarry Bay and the Presque Isle area, being excluded from the proposal rather than one large area connecting the two. The new boundary would be easier to identify on the ground, would decrease the size of the exclusion area, and would keep open the possibility of providing additional visitor developments to accommodate increased recreational use in the immediate vicinity of these popular areas.

In addition to the above changes, as in the other alternatives, small changes were made to the nonwilderness areas around the docks.



**Wilderness Alternative C**  
(Preferred Alternative)  
**Apostle Islands**  
National Park Service  
U.S. Department of the Interior



*(Back of map blank)*

## ALTERNATIVE D (LIMIT WILDERNESS TO REMOTE AREAS)

Alternative D emphasizes remote, isolated areas that provide the best opportunities for solitude and primitive recreation during the busy summer season. These areas are not on the current tour boat route and generally are more distant from the mainland. Altogether, approximately 23,000 acres of the park's 42,160-acre land base (55%) would be proposed as wilderness under alternative D. This is the equivalent of 33% of the entire park (69,372 acres), if one considers the waters as well as the lands within the park boundary.

Under this alternative Cat, North Twin, Ironwood, Bear, Eagle, Gull, most of Outer and Michigan, and portions of Stockton would be proposed as wilderness (see the alternative D map on page 39). These are all areas where one could be best assured of solitude and a primitive wilderness experiences regardless of the time of year.

Under alternative D the use and occupancy reservations on Bear Island would be potential wilderness. Although this area is identified as potential

wilderness, the National Park Service would continue to honor and respect these valid rights as required under the provisions of the Wilderness Act and NPS management policies.

This alternative was alternative 4 in the June 2002 alternatives workbook. One change from the workbook is that the nonwilderness area on Stockton Island has been decreased, with two areas, Quarry Bay and the Presque Isle area, being excluded from the proposal rather than one large area connecting the two. As in alternative C, the new boundary would be easier to identify on the ground, would decrease the size of the exclusion area, and would keep open the possibility of providing additional visitor developments to accommodate increased recreational use in the immediate vicinity of these popular areas.

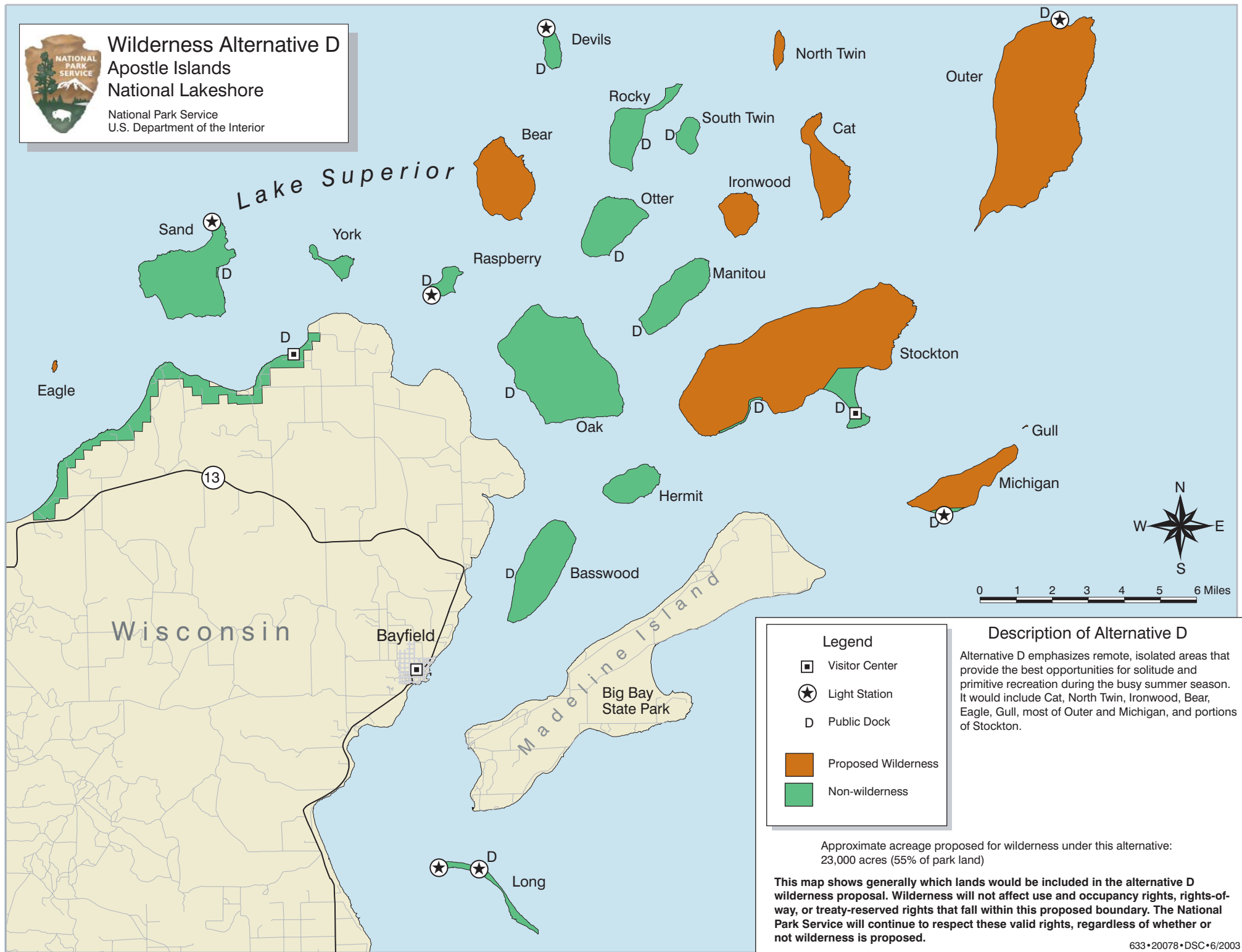
In addition to the above change, as in the other alternatives, small changes were made to the nonwilderness areas around the docks.

*Blank*



# Wilderness Alternative D Apostle Islands National Lakeshore

National Park Service  
U.S. Department of the Interior



*(Back of map blank)*

**TABLE 1: SUMMARY OF APPROXIMATE TOTAL ACREAGE (%) PROPOSED FOR  
WILDERENESS IN EACH ALTERNATIVE\***

	<b>Alternative A (No Action)</b>	<b>Alternative B</b>	<b>Alternative C (Preferred Alternative)</b>	<b>Alternative D</b>
Lake Superior	0%	0%	0%	0%
Mainland Unit	0%	0%	0%	0%
Basswood	0%	>99%	0%	0%
Bear	0%	100%	100%	100%
Cat	0%	100%	100%	100%
Devils	0%	94%	94%	0%
Eagle	0%	100%	100%	100%
Gull	0%	100%	100%	100%
Hermit	0%	100%	100%	0%
Ironwood	0%	100%	100%	100%
Long	0%	99%	0%	0%
Manitou	0%	>99%	>99%	0%
Michigan	0%	96%	96%	96%
North Twin	0%	100%	100%	100%
Oak	0%	>99%	99%	0%
Otter	0%	>99%	>99%	0%
Outer	0%	>99%	>99%	>99%
Raspberry	0%	97%	97%	0%
Rocky	0%	>99%	95%	0%
Sand	0%	97%	0%	0%
South Twin	0%	99%	99%	0%
Stockton	0%	>99%	93%	93%
York	0%	100%	100%	0%

\* NOTE: All percentages have been rounded and are approximate.

**TABLE 2: SUMMARY OF APPROXIMATE ACREAGE PROPOSED FOR  
WILDERENESS IN EACH ALTERNATIVE\***

<b>Alternative A (No Action)</b>	<b>Alternative B (% of land base)</b>	<b>Alternative C (Preferred Alternative) (% of land base)</b>	<b>Alternative D (% of land base)</b>
0 acres	39,500 acres (94%)	33,500 acres (80%)	23,000 acres (55%)

\* NOTE: All acreage figures have been rounded and are approximate.



## ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is defined as “the alternative that will promote the national environmental policy as expressed in §101 of the National Environmental Policy Act.” Section 101 states that “...it is the continuing responsibility of the Federal Government to...

- (1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations
- (2) assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings
- (3) attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences
- (4) preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice
- (5) achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities
- (6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources

Two of the above goals did not make a difference in determining the environmentally preferred alternative. Goal 1 is satisfied by all of the alternatives: Apostle Islands National Lakeshore is already a national park unit and as a trustee of this area the National Park Service would continue to fulfill its responsibilities to protect

this area for future generations. The difference between the alternatives in this regard is not appreciable. Goal 6 also was determined to be not applicable to this study.

When considering the remaining goals, the environmentally preferred alternative is the NPS preferred alternative in the *Apostle Islands National Lakeshore Wilderness Study / Environmental Impact Statement*. Of all the alternatives considered, alternative C best satisfies the four national environmental goals at a relatively high level. In particular, by designating 80% of the park as wilderness, it ensures that most of the park's natural and cultural resources would continue to be protected — this alternative would strike the best balance in protecting the park's natural and cultural resources. It would permanently protect most of the park's wilderness resources. From a regional and park perspective, the alternative would ensure that a diversity of landscapes are protected, ranging from more developed landscapes to wilderness landscapes, which are relatively scarce in the Upper Midwest. The alternative also would provide for the possible expansion of visitor facilities in limited areas in the future if needed to meet visitor needs. Managers would have flexibility to plan where future development occurred, with public involvement, and in providing new opportunities for interpretation of the park, assuring a diversity of individual choices for the visitor. There would be many places where visitors could go and learn about the park's human history and wilderness stories, contrasting the differences between wilderness and nonwilderness. Alternative C would provide visitors with the opportunity to have solitary experiences in much of the park. It also would provide opportunities for visitors to

gain a greater understanding and appreciation of wilderness through onsite interpretive media. Thus, alternative C would best satisfy national goals 2, 3, and 4, and 5, ensuring for the long term that visitors coming to the park see an aesthetically and culturally pleasing area, providing a wide range of opportunities for visitors to learn about and enjoy the area with minimal adverse impacts, and preserving the park's important natural and cultural resources.

Alternative A, the no-wilderness alternative, would not achieve the national goals as completely as alternative C, because the beneficial impacts of wilderness designation would not be realized. Under alternative A there would be the potential for additional developments in the future, which in turn could result in adverse impacts. Thus, the protection of cultural and natural resources, as articulated under national goals 2, 3 and 4, and 5, would be at a lower level than under alternative C. Wilderness is a scarce resource both in Wisconsin and in much of the country. With the potential for the loss of wilderness resources in the future, alternative A would not provide as wide a range of beneficial uses (goal 3), would not achieve as good a balance in sharing of life's amenities (goal 5), and would not be as likely to ensure an environment that supports diversity (goal 4) as alternative C.

Alternative B would protect the greatest amount of the park under wilderness, ensuring long-term protection of more of the park's natural resources than under alternative C. For instance, the biologically important sandscapes on Stockton and Long Islands would be protected as wilderness under alternative B, but not under alternative C. However, alternative B would have a higher potential for cultural resource impacts in the nonwilderness areas because future developments and associated high visitor use levels would be

restricted to a relatively few areas that also contain a high concentration of cultural resources. In other words, if developments need to be built in the future, alternative B would pose a greater threat to cultural resources in the nonwilderness areas than alternative C. There would also be more areas where managers might not apply the full range of historic structure treatment options, resulting in the possibility of cultural resources being left to decay or being removed. With so much of the park's islands being wilderness, there would be fewer opportunities to install interpretive infrastructure onsite and fewer places people could go to and contrast the differences between wilderness and nonwilderness — with fewer onsite opportunities people would not understand as well the effects of wilderness on people and the landscape. Consequently, alternative B would not preserve and tell the stories of the park onsite as well as alternative C. Thus, alternative B would not satisfy national goals 3 (attaining a wide range of beneficial uses without undesirable consequences), 4 (preserving important cultural and historic resources), or 5 (providing a balance that would result in a wide sharing of life's amenities) as well as alternative C.

Alternative D is similar to alternative C in meeting the national goals. However, alternative D would provide permanent protection to less of the park's wilderness resource and would have more areas where natural and cultural resource impacts could occur due to future developments. Thus, alternative D would not meet quite as well national goals 3 (attain the widest range of beneficial uses of the environment without degradation), 4 (preserve important cultural and natural resources), or 5 (providing a balance that would result in a wide sharing of life's amenities) as alternative C.

## ALTERNATIVES CONSIDERED BUT DISMISSED

The study team considered one other alternative proposal, which was alternative 2 in the June 2002 alternatives workbook. The alternative called for designating extensive areas as wilderness while still providing space for potential new developments designed to ensure a diversity of recreational experiences. This alternative strived to be as consistent as possible with the 1989 *General Management Plan*. It was similar to alternative B, but it would exclude a small number of additional areas for potential future development to support recreational uses that are consistent with the *General Management Plan*. In addition to the areas excluded from all alternatives, areas within a ¼-mile radius of the docks at Stockton Presque Isle, Manitou Island, Oak Island, and East Bay of Sand Island were also excluded, along with all of Basswood Island. Excluding these “growth” areas would ensure that the park would continue to accommodate a diversity of recreational uses in areas with the highest numbers of visitors. Most of these areas are visited by the tour boat, and if use continued to increase, a need might develop for additional facilities to support this use. In order to match this alternative as closely as possible with the park’s 1989 *General Management Plan*, all known significant cultural resource sites were also excluded from this alternative the approach used by the *General Management Plan*.

The following areas were proposed as wilderness: all of Eagle, Gull, and North Twin Islands, and most of Stockton, Oak, Manitou, Sand, Bear, Cat, Hermit, Ironwood, Michigan, Otter, Outer, Raspberry, Rocky, South Twin, York, Devils and Long Islands.

The study team dropped this alternative for several reasons. With all the exclusions around cultural resources, the wilderness area would be highly fragmented. This would make it extremely difficult for both managers and visitors to know when one is in or outside the wilderness. Also, there is no reason to exclude cultural resources from wilderness, unless they are major visitor destinations, because all applicable laws, regulations, and NPS policies apply to the protection of cultural resources whether or not they are in wilderness. In addition, the distinction between this alternative and alternative B is fairly minor — the alternatives only differ by about 2,500 acres. Eliminating the alternative would not substantially alter the range of alternatives being considered — there is nothing distinctive in this alternative that is not included in one of the other alternatives. Finally, very few people supported this alternative during the 2002 public review period.

**TABLE 3: SUMMARY OF IMPACTS**

<b>Impact Topic</b>	<b>Alternative A (No Wilderness)</b>	<b>Alternative B (Maximum Wilderness - 94% of land base proposed for wilderness)</b>	<b>Alternative C (Preferred Alternative &amp; Environmentally Preferred Alternative- 80% of land base proposed for wilderness)</b>	<b>Alternative D (Limit Wilderness to Remote Areas - 55% of land base proposed for wilderness)</b>
<b>Natural Resources</b>	Potential for minor to moderate, adverse, long-term impacts in localized areas due to future developments; least certainty that the park's natural resources would continue to be protected and maintained as they have been	Moderate, beneficial, long-term impacts in the wilderness area; negligible to moderate, short and long-term adverse impacts in localized areas in the nonwilderness areas depending on new developments that occurred	Moderate, beneficial, long-term impacts in the wilderness area; negligible to moderate, short and long-term adverse impacts in localized areas in the nonwilderness areas; however, more natural resources could be adversely affected in more areas than in alternative B, depending on the level of development that occurred	Minor to moderate, long-term, beneficial impacts in the wilderness area; negligible to moderate, short and long-term adverse impacts in localized areas in the nonwilderness areas; more natural resources could be adversely affected in more areas than in alternatives B and C, depending on the level of development that occurred
<b>Cultural Resources</b>	Potential for minor to moderate, long-term, adverse impacts, depending on the level of future development; minor to moderate, long-term beneficial impacts related to increased flexibility for treating cultural resources and for siting new developments	Potential for minor to moderate, long-term beneficial and adverse impacts in the wilderness area and moderate, long-term, adverse impacts in the nonwilderness areas, depending on the new development that occurred	Potential for minor to moderate, long-term, beneficial and adverse impacts in both the wilderness and the non-wilderness areas, depending on the new development that occurred	Potential for minor, long-term, beneficial and adverse impacts in the wilderness area, and minor to moderate, long-term, adverse impacts in the non-wilderness areas, depending on the new development that occurred
<b>Wilderness Resources</b>	Potential for minor to major, long-term, adverse impacts, depending on the level of development that occurred; least certainty that wilderness resources would continue to be protected as they have been	Major, long-term, beneficial impacts due to permanent protection bestowed by designation; could be some negligible, adverse, long-term impacts in nonwilderness areas due to new developments	Major, long-term, beneficial impacts due to permanent protection bestowed by designation; could be some minor to moderate, adverse, long-term impacts in non-wilderness areas due to new developments, primarily on Basswood, Sand, and Long Islands	Moderate, long-term, beneficial impacts; could be minor to major, long-term, adverse impacts in nonwilderness areas due to new developments, primarily on 12 islands
<b>Visitor Non-wilderness Experiences</b>	Potential for minor to moderate, long-term, beneficial impact, primarily due to the flexibility to expand recreational facilities into new areas	Potential for moderate, long-term, adverse impacts, primarily due to limits on the expansion of certain visitor facilities into new areas	Potential for minor, long-term, adverse impacts, primarily due to limits on the expansion of certain visitor facilities into new areas; some beneficial impacts due to more opportunities to tell wilderness and nonwilderness stories on the islands	Potential for negligible, long-term, adverse impacts, primarily due to limits on the expansion of certain visitor facilities into new areas; some beneficial impacts due to more opportunities to tell wilderness and nonwilderness stories on the islands
<b>Park Operations</b>	Potential for minor to moderate, long-term, beneficial impacts due to high management flexibility, and minor to major, long-term, adverse impacts, depending on the level and type of new developments that occurred	Potential for minor to moderate, long-term, beneficial impacts due to minimizing new developments in new areas, and minor to moderate, long-term, adverse impacts, due to reduction in management flexibility and increased costs of management in wilderness	Potential for minor to moderate, long-term, beneficial impacts due to a reduced likelihood of new developments in new areas, and minor, long-term, adverse impacts, due to reduction in management flexibility and increased costs of management in wilderness	Potential for minor, long-term, beneficial impacts due to fewer areas where new developments could occur, and minor, long-term, adverse impacts, due to decreased management flexibility and increased costs of management in wilderness

*Note:* See the "Methodology" section in the Environmental Consequences chapter for definitions of the impact intensities.



## **AFFECTED ENVIRONMENT**

*(Back of Divider Page Blank)*

## INTRODUCTION

The “Affected Environment” chapter describes the existing environment of Apostle Islands National Lakeshore and the surrounding region. The focus of this chapter is on key natural and cultural resources, wilderness resources, visitor uses and experiences, and park operations on the park’s 21 islands that have the potential to be affected by the alternatives should they be implemented. For additional information on the Apostle Islands, see the lakeshore’s web site ([www.nps.gov/apis](http://www.nps.gov/apis)), the 1989 *General Management Plan / Environmental Assessment* (NPS 1989), NPS (1988), and Howk (2001).

This chapter focuses on describing the park’s 21 islands, which have the potential to be affected by wilderness designation. There are also many natural and cultural resources on the mainland unit, as well as visitor and administrative facilities, such as the park headquarters in Bayfield and the Little Sand Bay visitor center. These all are important elements of Apostle Islands National Lakeshore, but because they would not be affected under any of the alternatives they are not included in the descriptions that follow.



## NATURAL RESOURCES

### WATER QUALITY

Lake Superior is the cleanest of the Great Lakes. Water quality in and around the Apostle Islands reflects the general oligotrophic (low nutrient) character of Lake Superior in general – the water quality of the park's Lake Superior waters and tributaries is relatively high. There appears to be little impact of human activities on water quality within the park.

Some areas used for full body contact recreation in the park, such as swimming and diving, are also areas where boats tend to moor and, as a matter of course, discharge “gray water” and bilge water. “Gray water” potentially contains nutrients and other contaminants (e.g., from cleansers). Although illegal, some boaters discharge sewage into the lake. Campers may also be adding nutrients to Lake Superior; however, they are discouraged from bathing and cleaning dishes in the lake. In recent years, outhouses have been replaced with vault toilets, eliminating leaching of human wastes into water bodies from this source.

In 1996, long-term water quality sampling sites were established in the park (Lake Superior Ecosystem Research Center 1997). Five open lake and three lagoon sites were sampled. Physical and chemical water quality parameters were measured and biological samples taken (zooplankton and benthos). The open water sites were found to have low nitrogen and phosphorus levels, low chlorophyll “a” concentrations, and high water clarity. All of the lagoon sites had low or nonexistent benthic organism populations and warm, highly colored, acidic waters. A three-year water quality study (1986-1988) was

conducted in the lakeshore by the Center for Lake Superior Environmental Studies, University of Wisconsin-Superior (McCauley et al 1989). Consistent with the most recent sampling, results of this study indicate that park waters are relatively free from contamination by human wastes, that concentrations of nutrients (e.g., nitrogen and phosphorus) were low, and that oil and grease in the sediments of heavily used Stockton harbor were low. Water quality studies conducted from 1979 to 1984 by the U.S. Geological Survey (USGS) in Lake Superior and the park, including inland streams and lagoons and nearshore waters within the park, indicated similar results (USGS 1988).

Introduction of toxic chemicals, such as polychlorinated biphenyls (PCBs), into Lake Superior is a serious concern. The vast majority of PCBs in Lake Superior have entered the system through atmospheric deposition (Eisenreich 1987). PCBs may move back out of the water at both the air-water and water-sediment interfaces. PCBs, dioxins, and other organo-chlorides accumulate in the fatty tissue of organisms and tend to bioaccumulate in the food chain. High levels of PCBs have been found in nesting herring gulls and elevated levels of PCBs and DDE (dichlorodiphenyldichloroethylene) have been found in nesting bald eagles in the lakeshore (Meyer, et. al 1994). During the 1990s, levels of PCB and DDE have decreased in bald eagles. Toxaphene, another bioaccumulative toxin, has become of increasing concern. Elevated levels of toxaphene were measured in lake trout collected near the Apostle Islands and toxaphene was found by the Minnesota Pollution Control Agency (1996) to be the dominant contaminant in lake trout in Lake Superior.

Reflecting the park's high water quality, Lake Superior waters within the park are being considered for designation as Outstanding Resource Waters (ORW) by the state of Wisconsin. Lake Superior also has been recommended by the International Joint Commission (IJC) as a demonstration area where no point source discharge of any persistent toxic chemical will be permitted (Lake Superior Binational Program 2000).

## **GEOLOGY AND COASTAL PROCESSES**

Today's Apostle Islands are the result of events beginning over 1 billion years ago. Colorful sandstones, which form the underlying bedrock and core of the islands were deposited during pre-Cambrian times. This sandstone, especially the Devils Island formation, forms cliffs and sea caves.

Pleistocene glaciation, which started around 3 million years ago and ended about 10,000 years ago, was the next significant event in the geological history of the islands. Thick deposits of reddish till were deposited by the glaciers on most of the islands. Three deposits of till were deposited, with the oldest being a sandy till and the two youngest being rich in clay (Nuhfer and Dalles 1983). Steep clay bluffs formed where the till is exposed, especially on the western sides of the islands.

The islands continue to be shaped by wave and wind energy generated by Lake Superior. Coastal features in the park include sandstone cliffs, clay bluffs, and sandscapes. Sandstone cliffs and clay bluffs are continually eroded by lake waves. On the other hand, sandscapes are dependent upon the longshore transport of sand.

Apostle Islands National Lakeshore has among the most diverse collection and highest quality sandscapes in the Great Lakes. Various sandscapes include: sandspits, cusate forelands, tombolos, a barrier spit, and numerous beaches. (Cusate forelands are a type of sand spit that are wider than they are long. Tombolos are sand features that join either two islands or an island to the mainland. Barrier spits are elongate sand ridges that extend generally parallel to the coast.) These coastal features in the park tend to occur on the southern end of islands and are found only where glacial till along shorelines provides a ready supply of sand (Nuhfer and Dalles 1987).

Factors within and outside the control of the National Park Service influence coastal processes. Lake Superior water levels, which are partially regulated through orders of the International Joint Commission, affect erosion rates on bluffs and sandscapes. NPS docks and other developments also may seriously affect local coastal processes. Docks, especially those with solid cores, affect the movement of sand along the coastline.

## **SOILS**

All soil formation evident on the Apostle Islands has taken place in the last 11,000 years. As soon as the topmost point on an island was exposed to the atmosphere, weathering, and plant colonization, soil formation (pedogenesis) began. The landscape of the Apostle Islands is geologically young and various forming processes have had very little time to work. Therefore, soil development in the area has usually affected no more than the upper four feet of surficial material. As a result, soil profiles are shallow (Cary et al 1978).

The soils of the Apostle Islands are derived from several parent materials that cause distinct variations over short distances. These parent materials are: lacustrine clay, water-deposited sand (by stream as well as lake), and glacial till (Brander et al 1978).

Topography has played a part in soil development. Most of the 21 islands are relatively level and low-lying. Water runoff is limited, with rain and snowmelt filtering downward through soil. Oak Island differs due to its elevation and rugged landscape (Cary et al 1978).

Between 1998 and 2000, the USDA Natural Resources Conservation Service mapped soils throughout the entire park. Soils on the islands were found to be quite diverse, ranging from sandy to clayey, and some new series were needed to define soils unique to the islands. The soils on the Apostle Islands overall have thicker humus/organic matter surfaces than the mainland. This may reflect reduced disturbance from logging, burning, and development typically seen on the mainland.

## VEGETATION

Located in far northwestern Wisconsin, Apostle Islands National Lakeshore is at the continental northwestern limits of the hemlock-white pine-northern hardwood forest and also contains elements of the boreal forest. In presettlement times about 90% of the islands were covered by an upland mixed coniferous/hardwood forest dominated by hemlock (*Tsuga canadensis*), white pine (*Pinus strobus*), sugar maple (*Acer saccharum*), yellow birch (*Betula alleghaniensis*), and white birch (*Betula papyrifera*).

The park's current forests reflect complex disturbance histories. Forests within the

park range from pristine old-growth forest without a history of deer browsing, to forests that have been subjected to logging, fires, and extensive deer browsing. Areas that escaped commercial logging include North Twin, Eagle, and Gull Islands and the lighthouse reservations on Outer, Sand, Devils and Raspberry Islands. In the case of Devils and Raspberry Islands, the reservations included the entire islands. The old-growth forest on Outer Island is one of the best examples of northern hardwood hemlock forest remaining in the upper Great Lakes (Judziewicz and Koch 1993). This stand is especially unique because it has not been affected by deer browsing.

Most of the park's forests were logged, first for white and red pines (*Pinus resinosa*), white cedar (*Thuja occidentalis*) and hemlock (ca. 1870), and later for hardwoods, particularly sugar maple and yellow birch. Today, a maturing second growth northern hardwood forest exists throughout the islands. However, the effects of logging remain. Hemlock and white pine are no longer dominant; the most important tree species in the archipelago are white birch, sugar and red maples, balsam fir (*Abies balsamea*), and white cedar (Judziewicz and Koch 1993).

The species composition of the boreal forest community was not changed due to logging. Today this community is dominated by white spruce, balsam fir, tamarack (*Larix laricina*), white cedar, birch, and aspen, as it was during presettlement times.

Following logging, deer populations irrupted on many of the islands, severely impacting species favored by deer, such as Canada yew (*Taxus canadensis*). Several of the islands, however, that did not have a history of deer populations and others that

had moderate deer populations have lush stands of Canada yew – a very rare species on the mainland due to deer browsing. Currently, deer populations occur on only a few islands.

About one-third of the islands' coasts consist of Precambrian sandstone ledges and bluffs. Local vegetation on these rock faces depends on the microhabitat and can vary from common willows (*Salix* spp.) and weed species, to subarctic rarities and species with calcareous tendencies. Steep reddish clay bluffs are vegetated with small trees of balsam poplar, white birch, red maple and showy mountain ash (*Sorbus decora*) (Judziewicz and Koch 1993).

As noted above, the park has a rich assemblage of sandscapes, including sandspits, cusped forelands, tombolos, a barrier spit (Long Island), and beaches. These are some of the most biologically diverse lands in the park. They are dominated by dune vegetation, beach grass (*Ammophila breviligulata*), and beach pea (*Lathyrus japonicus*), as well as a shrub and forest component of speckled alder (*Alnus rugosa*), quaking aspen (*Populus tremuloides*), and white birch. Landscape vegetation is resistant to natural disturbances; however, it is very sensitive to human trampling.

Over 800 plant species occur within the park, including 26 species of concern. Because the Apostle Islands are at the extreme northern frontier of Wisconsin, they tend to provide plant habitats not found elsewhere in the state. Regionally rare habitats in the park include old-growth forest, boreal forest, northern forests (five types), forest seep, clay bluff communities, sandstone cliff communities, lagoon and bog communities, forested ridge and swale, coastal fen, Great Lakes barrens (only example in the state), and

dune communities. The Wisconsin Department of Natural Resources Natural Heritage Inventory Program has designated four state natural areas within the park, including maritime forest, landscape (includes beaches, sandspits, cusped forelands, and tombolos), maritime cliff, and critical species areas.

Exotic vegetation in the lakeshore is primarily confined to disturbed landscapes, including old logging camps, farmsteads, fishing camps, light station grounds, and quarries. NPS developed areas, such as Presque Isle on Stockton Island, and developments on the mainland unit also contain exotics. Landscapes are vulnerable to invasion of exotics, especially where native vegetation has been affected by human disturbance (NPS 1999).

## WILDLIFE

Island environments, naturally isolated, are a barrier for distribution of some animals. The Apostle Islands were covered by Lake Superior during the end of the last glacial period (11,500 years before present). When the lake level dropped to 450 feet above sea level, around 9,500 years before present, the current archipelago was part of the mainland and the majority of terrestrial vertebrates and plant life became established. Inconsistencies in vertebrate distribution indicate that other factors were operating. Mobile species may have colonized some of the islands by swimming (e.g., deer, bear, beaver) or by crossing winter ice (e.g., deer, red fox, coyote) (Anderson and Stowell 1985). Other species may have been intentionally or unintentionally brought to the islands by humans. Transportation of hay to the islands for work animals and livestock related to logging and farming activities may have been infested by meadow voles,

woodland deer mice, and garter snakes (Meierotto 1976).

Thirty-seven species of mammals are known to occur in the park. Large mammals are not common on most of the islands and tend to be transient. Mammals that are common to most islands include red squirrel, snowshoe hare, deer mouse, and redback vole. Other species, such as black bear and white-tailed deer, are locally common on certain islands. Mammal species found on the islands less frequently include fox, coyote, otter, and fisher. Some common mainland species that are less mobile or dormant in the winter (e.g., gray squirrel, least chipmunk, porcupine, skunk, raccoon, and possibly some species of amphibians and reptiles) are not present on the islands. However, Long Island, currently a barrier spit rather than an island, contains most species that occur on the mainland.

White-tailed deer were either absent or in very low numbers prior to European settlement (Anderson and Stowell 1985). Habitat changes due to logging resulted in deer irruptions on many of the islands with populations peaking in the early to mid-1950s. However, by the late 1960s, deer decreased to low numbers through liberal hunting quotas. Deer can occur on any of the islands within the park; however, reproducing populations are limited to Basswood, Oak, and Sand, and potentially Long and Stockton Islands. A reproducing population of deer was not known on Sand Island until the last few years and their numbers appear to be increasing rapidly.

Similar to deer, beaver were probably not present in the park prior to settlement of the region. Their populations also peaked following logging, especially on Outer and Stockton Islands, but have since been in a

steady decline. On Outer Island, beaver have declined rapidly in recent years, decreasing from 24 to two active beaver lodges between 1994 and 2002. On Stockton Island, there have not been active beaver lodges since 1994.

Stockton and Sand Islands are the only islands with a known reproducing black bear population. Bears have overwintered and/or occasionally been seen on a number of other islands, such as Oak, Basswood, Long, Ironwood, Manitou, Hermit, and Raspberry. Black bears on Stockton Island were studied and monitored from 1984 to 1994. This island population increased significantly from 1984 to 1994 to a density of 2.1 bears per square mile. (In 1990, the greatest population density estimated for mainland Wisconsin was 1.0 bears per square mile.) The bear population on Stockton Island grew from a population of three animals in 1984 to a peak of 31 in 1994 (Fleming 1997). Their population remained high (30) in 2002.

Due to its strategic geographic location and wide diversity of habitats, Apostle Islands National Lakeshore provides a refuge for birds. Through the park's long-term monitoring program for forest breeding birds, 150 species of birds have been recorded (NPS 2001). The islands provide important habitats for resident breeding birds as well as neotropical migrant land birds (birds that migrate to Central and South America in winter). Over 89% of the breeding birds in the park are migrants, 59% of which are neotropical migrants.

The Apostle Islands are an important migratory flyway stopover in the Great Lake region. Nearly all of the islands provide habitat for migrating birds. In particular, Outer and Long Islands provide

key habitats for migratory birds: Outer Island is important for passerines, hawks and falcons, while Long Island is important for waterfowl, passerines and shorebirds. Migratory bird surveys conducted on Outer and Long Islands have recorded over 200 species (NPS 1998).

The park provides important nesting habitat for the following colonial nesting birds: herring gulls, double-crested cormorants, great blue herons, and cliff swallows. Gull and Eagle Islands combined have 88% of the park's breeding herring gull populations and 80% of the herring gull breeding population on the entire Wisconsin shore of Lake Superior. Eagle Island has the only great blue heron rookery in the park.

The park also provides nesting habitat for bald eagles (federally threatened) and piping plover (federally and state endangered). Eagles began recolonizing the Apostle Islands in the early 1980s and young have been produced annually since 1983. However, nest productivity still remains below levels found on the mainland. Current research (1991-1993) indicates that lowered productivity is primarily due to a low food base and the continuing presence of anthropogenic toxic chemicals in Lake Superior (Meyer et al 1994). Critical habitat for piping plover has been designated by the U.S. Fish and Wildlife Service on Long Island and the Michigan Island sandspit. Long Island is the only location where piping plovers have successfully nested in the state of Wisconsin in recent years. Six species of salamanders, ten species of frogs and toads, and six species of reptiles

are known to occur within the park, including the islands. The most common species of salamander are blue-spotted, spotted, and eastern red-backed. Four-toed salamander and Central newt are regionally uncommon, and mudpuppies are regionally local. Frogs and toads that occur in the park and are regionally common include: eastern American toad, northern spring peeper, Eastern gray tree frog, green frog, northern leopard frog, mink frog, and wood frog. Chorus frogs are regionally local, Cope's gray treefrogs are regionally rare, and American bullfrogs are regionally uncommon. The park has a rather depauperate turtle fauna, with only two species, painted and snapping turtles. The most abundant snakes in the park are eastern gartersnakes. Other snake species that are present include northern red-bellied snake, northern ring-necked snake, and smooth greensnake (Casper 2001a and 2001b).

The park's enabling legislation permits hunting, fishing, and trapping. A special black-powder season for deer has been open on Oak and Basswood Islands since 1985. Since 2002 tribal members have begun to exercise their treaty-reserved rights to hunt, fish, and gather on park lands. Species that may be hunted and trapped in the park include deer, black bear; fox, coyote, beaver (mainland, Outer and Stockton), otter, mink, fisher, muskrat (mainland), snowshoe hare, waterfowl, woodcock, and ruffed grouse (mainland and Long). However, with the exception of the black-powder and tribal seasons, hunting and trapping is relatively rare on the islands.

## CULTURAL RESOURCES

For the purposes of this environmental impact statement, cultural resources are divided into archeological resources, cultural landscapes, historic structures, and ethnographic resources. All of these resources are important elements of Apostle Islands National Lakeshore.

The cultural resources of the Apostle Islands preserve the stories of men and women whose lives have touched the islands over centuries of human occupation. Some lived or worked on the archipelago; others came as visitors. Inhabitants of the islands have included pioneer farmers, fishermen, and lighthouse keepers. Early Native Americans camped and gathered plants on the islands; loggers and quarrymen harvested building materials; tourists came to enjoy the islands' beauty.

The people of the Apostle Islands left evidence of their presence. These traces may be easy to see, like the massive walls of sandstone quarries, or the tall lighthouse towers. Other traces blend subtly into the landscape: farm clearings filling in with grass and brush, stone walls running through second-growth forest, old logging roads now used as hiking trails. Each of these elements contributes to a seamless picture, telling the story of remote islands whose landscape was profoundly affected by human activity, but which are gradually returning to a wild state.

Cultural resources are distributed widely throughout the park. In general, they are most often along shorelines, where easy access has promoted human settlement; yet numerous prehistoric and historic sites have been identified in island interiors, as well. Certain islands, such as Sand and Basswood, are known to be particularly rich in cultural sites, but nearly all the

islands have some record of human occupation.

### ARCHEOLOGICAL RESOURCES

Archeological resources are the remains of past human activity and records documenting the scientific analysis of these remains. Archeological features are typically buried but may extend above ground. Examples of archeological resources within Apostle Islands National Lakeshore include Native American campsites dating back several centuries, pioneer farmsteads from the 1870s, and logging camps of the early 20th century. The park also includes numerous submerged archeological sites, such as shipwrecks and historic dock structures, which are outside the scope of this document.

Surveys conducted so far have identified more than 60 archeological sites on the Apostle Islands. However, only a fraction of the park's land area has been surveyed, and it is almost certain that there are a substantial number of sites not yet discovered.

### HISTORIC STRUCTURES

Structures are material assemblies that extend the limits of human capability. The park includes a wide variety of historic structures, ranging from the modest fishermen's cabins of Manitou Island to the 112-foot light tower on Michigan Island. Some historic structures are in ruins, yet still retain the ability to tell stories of former occupants, such as the cluster of collapsing log buildings on Bear Island, which give vivid evidence of a busy lumber camp.

The National Park Service inventories historic structures by means of the List of Classified Structures (LCS) program. This inventory lists all structures within the park that possess historical and/or architectural/engineering significance. As of 2001, 163 structures within Apostle Islands National Lakeshore were on the List of Classified Structures (NPS 2002); revisions recently undertaken are expected to add slightly to this total.

## ETHNOGRAPHIC RESOURCES

Ethnographic resources are basic expressions of human culture and the basis for continuity of cultural systems. A cultural system encompasses both the tangible and the intangible. It includes traditional arts and native languages, religious beliefs, and subsistence activities. Some of these traditions are supported by ethnographic resources: special places in the natural world, structures with historic associations, and natural materials. Management of ethnographic resources acknowledges that culturally diverse groups have their own ways of viewing the world and a right to maintain their traditions.

Further research is necessary to identify the full range of ethnographic resources within the Apostle Islands. No systematic survey of ethnographic resources has yet been conducted. However, it is known that a wide variety of traditionally used plants are found within the park: a *Traditional Resource Utilization Study*, conducted in 1999, identified 224 plant species of importance to the Ojibwe (Stoffle et al 2001). It is possible that there may be ceremonial sites as well.

## CULTURAL LANDSCAPES

Cultural landscapes are settings that humans have created in the natural world:

intertwined patterns of things both natural and constructed. These landscapes are places that reflect expressions of human manipulation and adaptation of the land.

Historic vernacular landscapes illustrate peoples' values and attitudes toward the land and reflect patterns of settlement, use, and development over time. Examples of historic vernacular landscapes within the Apostle Islands include the six light stations, with their complex arrangements of structures, gardens, clearings, and walkways, and commercial fishing sites, with cabins, docks, drying reels, and other utility structures.

Ethnographic landscapes are areas associated with contemporary groups but are used or valued in traditional ways. Although no specific ethnographic landscapes have been identified within the Apostle Islands National Lakeshore, the area has long been a cultural center for the Ojibwe (Chippewa) people. It is possible that further research will identify the presence of ethnographic landscapes within the park.

Archeological sites may also constitute cultural landscapes. Clearings in the forest, berms, foundations, and other structural remains offer evidence of a site's human history.

The National Park Service inventories cultural landscapes by means of the Cultural Landscape Inventory (CLI) program. The inventory for Apostle Islands National Lakeshore has not yet been undertaken. A preliminary survey conducted in 1993 identified 13 potentially eligible vernacular landscapes within the park (NPS 1993), but this figure may be subject to revision upon further study.



## WILDERNESS RESOURCES (INCLUDING VISITOR WILDERNESS EXPERIENCES)

Although most of the lands comprising Apostle Islands National Lakeshore were at various times logged, quarried, farmed, or otherwise utilized by humans in a multitude of ways, these activities ceased for the most part either before or just after the park was established in 1970. Since that time, and for considerably longer on some islands, the vast majority of the park's lands have been left to the forces of nature.

Thomas Heberlein, a rural sociologist and professor emeritus at the University of Wisconsin – Madison, has studied boaters at Apostle Islands and their attitudes since 1975. While the issue is complex and the proportions of the various user groups have shifted over time, Heberlein has consistently found that a majority of island visitors recognize the wilderness characteristics of the islands, and appreciate them (Heberlein et al. 1999, Grossberg 1999).

Many of the sailboaters and motorboaters that park staff have met speak enthusiastically about the scenery afforded by the approximately 140 miles of undeveloped island shorelines in the park. These visitors tend to anchor off the islands, and spend comparatively little time hiking or camping on the islands themselves (with beaches being an exception). Grossberg (1999) found that “viewing pristine scenery” was very important to the recreational experiences of these visitors. Many kayakers enjoy paddling along these same wild shorelines, and are doing so in rapidly increasing numbers. A subset of each of these user groups also enjoys entering into the undeveloped interiors of the islands for day hiking or camping.

Whether visitors are entering the wild parts of the park, or simply enjoying the view from their boats, they are appreciating the wild resources of the park that provide such contrast to their everyday lives and experiences (Grossberg 1999).

The Wilderness Act speaks of wilderness as a resource in itself. The Apostle Islands National Lakeshore is rich in many of the resources and values mentioned in the Wilderness Act, including:

- minimal levels of development, resulting in an appearance of “naturalness”
- opportunities for primitive, unconfined recreation
- opportunities for solitude

### MINIMAL LEVELS OF DEVELOPMENT

Although roads existed on many of the islands, mainly to support logging activities or the lighthouses, virtually none of them are maintained as roads at this time. Some of these former roads are maintained as hiking trails, but most are completely overgrown, and it now requires a rather discerning eye to note where they may have been. Collectively, the nearly 40,000 acres of islands constitute a very large roadless area by Upper Midwest standards.

Other forms of development are also relatively sparse. There is no permanent human presence on any of the islands within the park. Areas where the National Park Service actively manages visitor support facilities, historic lighthouses and other structures, or performs grounds

work (such as mowing), currently amount to roughly 200 acres on the islands. Other developments exist, such as hiking trails and campsites, but for the most part these developments are consistent with the Wilderness Act and NPS wilderness management policies. Thus, for the purposes of this study, roughly 99.5% of the island-based lands within the park can be considered to possess “minimal levels of development.”

### **OPPORTUNITIES FOR PRIMITIVE, UNCONFINED RECREATION**

There are opportunities for primitive, unconfined recreation on nearly every island in the park. Camping is available on 18 of the 21 islands. In 2002 there were just over 20,000 visitor days of camping recorded on the islands. After subtracting out the visitor days at group campsites, and at the more concentrated camping areas such as Stockton - Presque Isle, nearly 10,000 of these visitor days are at campsites in the areas being considered for wilderness. There are a total of 55 miles of hiking trails on 12 of the islands. It is not known how many visitors make use of the trails, but the opportunities are numerous.

Except for camping, which requires a permit, recreation on the islands is largely unconfined. A small number of areas are closed during the main visitor season to protect nesting bird populations, but access to most of the islands is unregulated.

### **OPPORTUNITIES FOR SOLITUDE**

The islands are logistically challenging to reach, and the visitor season is relatively

short. The majority of the shorelines are steep or rocky, making access difficult or impossible in many areas. The only places where relatively large numbers of people (10-30+) may occur at times are near dock areas, some beaches, lighthouses, and group camping areas. Opportunities for solitude are often not available in these places. Island visitation has remained steady over the past decade, with a combined total of roughly 70,000 to 80,000 visitors per year, of which 84% occurs during the summer. With the exception of the peak use months of June through August, very few people visit the islands.

Heberlein et al. (1999) found that, overall, kayakers feel less crowded in the park than boaters. This may be due to the tendency of boaters to congregate near islands with the best anchorages. Even then, however, only 17.6% of boaters felt the places they stopped at were crowded, compared to 12.8% of kayakers. Clearly there are numerous opportunities for solitude in the islands.

Due to the combined influences of beach, campsite, and dock locations, there is a very strong tendency for park visitors to stay near shorelines. Other factors, such as insect populations, probably contribute to this tendency as well. In any case, for those visitors willing to venture into them, the interiors of the islands offer outstanding opportunities for solitude — even during the peak visitor season. On many islands, it is possible to walk for miles without encountering another visitor. Most of the sounds of civilization give way to the sounds of the forest after traveling only a short distance inland.

## VISITOR NONWILDERNESS EXPERIENCES

For the purposes of this document, “visitors” are defined as anyone who enters the park or uses park facilities for any reason.

Enjoying the park and its resources is a fundamental part of the visitor experience. That experience is heightened when it progresses from enjoyment to an understanding of the reasons for a park’s existence and the significance of its resources. Natural and cultural resources and park facilities provide opportunities for a variety of visitor experiences at Apostle Islands National Lakeshore. Many of these visitor experiences are not related to characteristics associated with wilderness (e.g., opportunities for solitude, opportunities for primitive and unconfined recreation, and naturalness). These types of visitor experiences may include, but are not limited to, group activities, recreational activities (e.g., camping, picnicking), participating in personal interpretive services (e.g., staffed visitor centers, ranger conducted activities), and utilizing nonpersonal interpretive services (e.g., wayside exhibits, visitor center exhibits, radio information systems, computer technologies) to help visitors form their own intellectual and emotional connections with the meanings and significance of park resources.

### GENERAL VISITOR USE PATTERNS

The average number of annual recreational visitors to Apostle Islands National Lakeshore in the period from 1990-2001 was 166,728. In 2001 there were a little more than 195,000 recreational visitors in the park.

Approximately 77,000 of these were island visitors. A total of 29,000 visitors toured the Apostle Islands by the concessioner’s cruise boat, while the remainder came by private motorboat, kayak, and sailboat. (Since 1990, the number of kayak/campers in the park has almost quadrupled, while the numbers of campers using other forms of transportation has remained relatively constant.) The seasonal visitation patterns for this period show that roughly 2% of island visitation occurs in spring (March - May), 84% in summer (June - August), 14% in fall (September - November), and less than 0.1% in winter (December - February). Peak use is during July and August, on weekends.

Most visitors go to more than one island in a day. Most motorboaters and sailboaters congregate at relatively secure anchorages or docks at Stockton, Rocky/South Twin, Raspberry, Oak and Sand Islands. Not surprisingly, these islands also receive the highest use levels – these islands have scenic attractions, have visitor facilities, several are relatively close to the mainland, and most are on the concessioner’s tour boat circuit. Islands that are closer to the mainland tend to receive higher use levels, while the more remote islands, such as Outer and Cat, receive lower use levels. Eagle and Gull Islands, and the northwest corner of Otter Island are closed to visitors in the summer (May 15 to September 15) due to the presence of nesting birds.

### ISLAND EXPERIENCES

The Apostle Islands offer a variety of recreational experiences. Recreational users of the park include sailors, kayakers, motorboaters, hikers, sightseers, picnickers, swimmers, campers, fishers, hunters, photographers, birdwatchers, divers,

skiers, snowshoers, berry pickers, nature students, and lighthouse buffs. The most popular activities on the islands tend to be sightseeing, lighthouse tours, day hikes, and camping, although many visitors who come to the park participate in more than one activity.

Most people who spend time on the islands stay on shorelines, particularly beaches, or in the general vicinity of the developed areas, particularly areas with campsites and/or lighthouses. In general, cruise boat, sailboat, and motorboat visitors (who all together make up the largest number of users) tend to come on shore to use the park facilities, picnic, or explore. With the exception of campers, these visitors spend relatively short periods on an island and rarely take long hikes. The motorboat and sailboat visitors usually sleep on their boats, with only a small number camping on shore. (In 2002, 14% of campers were motorboat users and 3% were sailboaters.) Kayakers tend to be more likely to camp (55% of all campers were kayakers in 2002) and spend more time exploring an island.

Over 60 developed campsites are on 14 islands; eight of these campsites are group campsites on four islands. Individual campsites generally contain a tent pad, fire ring, and picnic table, with a vault toilet nearby; group sites have tables, fire rings, large gathering areas, and vault toilets nearby. All park visitors that camp on the islands are required to obtain a permit. (The permit system allows campers to reserve campsites in advance and helps park staff monitor the amount of use each campsite receives.) The number of camping permits issued annually has increased from 1,330 in 1997 to 1,697 in

2002. In 2002, a total of 7,452 campers spent a total of 20,028 nights in island camping areas. A total of 2,812 of those campers (38%) camped in groups of eight or more individuals. Campers spent 10,207 nights in group campsites on Basswood, Oak, Sand, and Stockton Islands or in the campground at Presque Isle on Stockton Island.

A total of about 55 miles of trails are actively maintained on 12 islands. These trails provide hiking opportunities for visitors, as well as opportunities to experience and enjoy a variety of natural and historic features.

Many opportunities exist for picnicking on the islands. All individual campsites, except one, and all group campsites have picnic tables. Lighthouse lawns tend to have picnic tables. There are also picnic areas that are separate from campsites and lighthouses on Oak, Rocky, South Twin, and Stockton-Presque Isle.

The islands provide a number of interpretive facilities and programs for visitors. A visitor center is on Stockton, which has exhibits on natural and cultural history. Evening talks or campfire programs are offered on Stockton. Guided walks or tours are given on Stockton, the Manitou Island fish camp, and at several of the lighthouses. In 2002, 1,390 visitors were contacted in the park visitor center at Stockton Island, 11,862 visitors participated in guided tours of lighthouses on Raspberry, Sand, Michigan, Devils, and Outer Islands, 3,860 visitors took guided tours of the Manitou Island Fish Camp, and 1,395 visitors attended evening programs at Stockton Island.

## **PARK OPERATIONS**

The park's operations are discussed below under four divisions: interpretation and education, protection, planning and resource management, and facility management. As noted in the beginning of this chapter, this section ignores the park headquarters in Bayfield, which plays a major role in all of the park's operations, and visitor and administrative facilities on the mainland unit because they would not be affected under any of the wilderness alternatives.

### **INTERPRETATION AND EDUCATION**

The park's island-based interpreters and educators consist mostly of temporary employees hired during summer months. The NPS interpretation and education staff are augmented with volunteers through the summer months.

The park's island-based interpretive efforts have traditionally centered around developed visitor use areas. In 2002, interpretive park rangers were stationed at Stockton Island's Presque Isle, the Manitou fish camp, and the Raspberry Island lighthouse, all of which operate seasonally. Logistics are a constant challenge for the park staff even when the weather cooperates. Typically, interpretive park rangers and volunteers staff the visitor center at Stockton-Presque Isle from mid-June to Labor Day. From mid-June through the end of September interpretive park rangers and volunteer light keepers conduct lighthouse tours and provide educational walks and programs at all lighthouses on the islands, except for those on Long Island. As with most other island-based workers, these employees and volunteers usually live in housing units

on the islands and are transported off the islands for their days off duty.

An information desk, interpretive displays, and book sales are also located at the Stockton-Presque Isle visitor center. Interpretive operations include assistance in trip planning and issuing of backcountry camping permits. Informational signs, maps, and bulletin boards, as well as wayside exhibits, are located at many docks and developed areas throughout the park. There are a few wayside exhibits located in more remote areas on several islands.

### **PROTECTION**

Visitor and resource protection park rangers conduct patrols of about 140 miles of island shoreline, numerous historic and archeological sites, trails, campsites, and public use areas and facilities on 21 islands spread out over an area larger than Rocky Mountain National Park. Protection rangers are stationed at Little Sand Bay and Roys Point on the mainland year round and at Stockton-Presque Isle during the summer. Most are permanent park employees, although they are typically supplemented with a small number of temporary employees each summer. These employees perform law enforcement, wildland fire suppression, structural fire prevention monitoring, building and fire security, emergency medical services, and search and rescue operations on the islands, often under very challenging conditions.

### **PLANNING AND RESOURCE MANAGEMENT**

Park planning and resource management employees strive to increase understand-

ing of the natural and cultural resources of the islands and devise strategies for the public to interact with those resources in a manner that ensures their preservation for future generations. The staff monitor the park's wildlife, vegetation, and air and water quality. They assess the historic and cultural sites located within the park for historic significance and make recommendations for their preservation. They add to knowledge and understanding of the park's natural and cultural resources by performing historical research and scientific studies and assist park cooperators who are interested in performing their own research. This knowledge is then applied, with the assistance of other park divisions, in a variety of restoration projects. Planning and resource management staff also educate park staff on current issues affecting park resources, perform National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA) compliance, and direct or participate in park planning efforts such as this study.

Planning and resource management staff consists of natural and cultural resource specialists, supplemented by a small number of temporary or volunteer technicians. These employees tend to be mainland-based but spend considerable amounts of time throughout the islands during the short summer field season. As with other park staff, transporting planning and resource management staff to the islands is a constant logistical challenge.

## **FACILITY MANAGEMENT**

Facility management staff cares for an enormous variety of park developments and cultural resources. Historic

preservation staff face the challenging task of slowing or preventing decay in the 160 historic buildings that are spread throughout the park, including the largest collection of lighthouses found anywhere in the national park system. Facility management crews build and maintain hiking trails (55 miles spread over 12 islands) and campsites (more than 60 spread over 14 islands), repair docks (17 on 13 islands), and maintain a wide variety of grounds, utility systems, and other visitor use facilities distributed over a very large area. Facility management staff also is responsible for maintaining all of the park's housing quarters, as well as the visitor center at Stockton-Presque Isle.

Skilled in a variety of crafts and trades, facility management staff consists of permanent employees supplemented by temporary employees in the summer. Most facility management operations are not based on the islands. Rather, these staff is in almost constant motion, regularly transporting themselves and others to the islands. Routine activities on the mainland, such as pumping outhouses or delivering propane, become adventures on islands in Lake Superior. Some facility management staff is devoted to simply keeping the park's aging fleet of more than 20 boats in safe, working order.

Island-based park staff on Stockton, Sand, Oak, and Rocky Islands is seasonally housed in government-owned housing. Raspberry Island staff resides in historic quarters at the Raspberry Island light station, and volunteer light house keepers are housed in a similar manner on Devils, Michigan, and Outer Islands.



## ENVIRONMENTAL CONSEQUENCES



***(BACK OF DIVIDER PAGE BLANK)***

## INTRODUCTION

The National Environmental Policy Act (NEPA) mandates that environmental impact statements disclose the environmental effects of proposed federal actions. In this case, the proposed federal action would be the designation of wilderness in Apostle Islands National Lakeshore. This “Environmental Consequences” chapter analyzes the potential effects of four alternatives on natural resources, cultural resources, wilderness resources, the visitor non-wilderness experiences, and operations of Apostle Islands National Lakeshore. By examining the environmental consequences of all alternatives on an equivalent basis, decision-makers can decide which approach creates the most desirable combination of the greatest beneficial results with the fewest adverse effects on the park.

Ordinarily, the federal action that necessitates the preparation of an environmental impact statement is some type of planned development, such as the construction of a road or building. In this case, the federal action being evaluated is whether or not to designate wilderness in the park. The result of this federal action would either be a permanent commitment to continue to protect and manage most of the existing natural, undeveloped portions of the park as wilderness (alternatives B, C, and D), or the removal of a policy constraint that has prevented most new developments from occurring in most parts of the park (alternative A).

As noted in the “Purpose and Need” chapter, this study is not intended to address questions regarding how a wilderness area should be managed. Most of these questions would be

addressed in a subsequent wilderness management plan and accompanying environmental document. However, in order to analyze the impacts of wilderness designation it is necessary to generally examine and assess the implications of changes in management resulting from wilderness designation. The text box in the “Purpose and Need” chapter generally describes what management actions, uses, and developments would and would not be permitted in a wilderness area. It is assumed in this analysis of the alternatives that if wilderness is not designated in parts of the park, administrative or visitor developments could be built on the undeveloped parts of the islands in the future, consistent with the park’s current and future general management plans. In order to allow new development in areas outside the development zones designated in the current *General Management Plan* (1989), the plan would need to be modified. If this were to occur, opportunities for public involvement would be provided in the planning process, as required under law and NPS policies.

It is important to note that because the 1989 *General Management Plan* found that 97% of the park was suitable for wilderness designation, NPS policy has required that the wilderness values of this area be protected until Congress and the President have taken final action. As a result, the vast majority of Apostle Islands National lakeshore has been managed as *de facto* (unofficial) wilderness. For the purposes of this environmental impact assessment, it is assumed that Congress would take action to implement each of the alternatives, either designating new wilderness as outlined in the alternative,

or agree that no wilderness would be designated in the park.

Because of the above policy constraint, it is difficult to know what the park might look like should the long-standing *de facto* wilderness management guidance be lifted. Thus, instead of analyzing the impacts related to a planned development, this chapter analyzes the impacts related to an assortment of developments that could be built if wilderness were not designated on some or all of the islands. The analysis is general because there simply is not a plan that outlines how the islands could be developed should the park's long history of *de facto* wilderness management be removed.

Although it cannot be known with certainty what developments might be constructed in the park if current *de facto* wilderness management guidance was lifted, it is reasonable to assume that the following developments would be considered:

- New campsites: There has been an increase in camping on the islands since the 1989 *General Management Plan* was released. While campsite development can take place in wilderness areas, the nature and distribution of the campsites is necessarily different in wilderness.
- New picnic areas: Increased use of the park by large groups has led to an increasing demand for this type of facility.
- New trails: Trails can be constructed in wilderness areas, but their level of development and placement may vary in some alternatives. If the current wilderness management restrictions were lifted, some of the new trails could be paved, and they could include self-guided

interpretive trails with permanent waysides.

Island visitation has been kept to low numbers due to the relative inaccessibility of the islands. Future improvements in transportation technology could conceivably reduce the role of Lake Superior in limiting visitation, however. Depending on future circumstances (e.g., if visitation were to substantially increase and if the park's operating budget was sufficient), it is possible the following developments might be considered:

- Additional or expanded dock facilities: Boaters have expressed an interest in seeing more docks in some areas and expanded docks in others. Although docks extend out into Lake Superior, which is excluded from all alternatives, they have the effect of concentrating relatively large numbers of people in a small area. Thus, new docks would not ordinarily be constructed adjacent to wilderness. However, it also should be stressed that no existing public use docks would be removed by the National Park Service under any of the alternatives being considered.
- Additional structures to serve visitors or house island-based park employees: Examples of structures that might be built include visitor contact stations, storage facilities, shelters, restrooms, and amphitheaters.

Because it is difficult to know what development(s) might be built where, and to speculate about other management implications of wilderness and nonwilderness, the potential consequences of the alternatives are analyzed in general terms using

qualitative analyses. Consistent with the National Environmental Policy Act, the National Park Service would conduct additional environmental analyses with appropriate documentation before implementing site-specific management actions or building new developments in the park.

The existing conditions for all of the impact topics that are analyzed here were identified in the “Affected Environment” chapter. This chapter is organized by impact topic. All of the alternatives are assessed under each impact topic. For each impact topic, there is a description of the positive (beneficial) and negative (adverse) effects of each of the alternatives and a brief conclusion for each alternative.

Alternative A, the no wilderness alternative, is the baseline for comparison of the effects of the other alternatives. The other three alternatives were compared to alternative A to identify the incremental changes that would occur as a result of changes in the wilderness proposals.

At the end of the chapter there is a brief discussion of unavoidable adverse impacts; irreversible and irretrievable commitments of resources; and the relationship of short-term uses of the environment and the maintenance and enhancement of long-term productivity. A brief summary of the impacts of each alternative is in table 3 at the end of the “Wilderness Alternatives” chapter.

## METHODOLOGIES FOR ANALYZING IMPACTS

As noted previously, this chapter is analyzing impacts of designating wilderness and impacts from potential developments in nonwilderness areas. The wilderness study team based the impact analysis and the conclusions in this chapter largely on information provided by experts in the National Park Service, on park staff insights and professional judgments, and on the review of existing literature and studies. The team's method of analyzing impacts is further explained below.

The environmental consequences for each impact topic were defined based on impact type, context, duration, and intensity.

Effects can be either adverse or beneficial for the topic being analyzed. The effects also can be direct or indirect. Direct effects are caused by an action and occur at the same time and place as the action. Indirect effects are caused by the action and occur later or farther away, but are still reasonably foreseeable.

Context refers to the setting within which an impact is analyzed, such as the affected region or locality. In this document most impacts are either localized (site-specific) or parkwide.

Impact duration refers to how long an impact would last. Unless otherwise specified, in this document the following terms are used to describe the duration of the impacts:

*Short term:* The impact would be temporary in nature, lasting a year or less

*Long term:* The impact would last more than one year and could be permanent in nature, such as the loss of soil due to the construction of a new facility

Impact intensity refers to the degree or magnitude to which a resource would be beneficially or adversely affected. It is important to consider that when evaluating the effects of wilderness, terms like “beneficial” or “adverse” are somewhat subjective and value-laden, and what one person might think of as a adverse impact may be thought of by another person as a beneficial impact. Use of these terms should not be viewed as a value judgment on the part of the National Park Service relative to wilderness. For example, if the analysis concludes that the constraints imposed by wilderness on sign construction is an adverse impact, this does not imply that the National Park Service prefers signs more than wilderness. Nor does it imply that the National Park Service has a plan to develop more signs. Rather, it is an acknowledgement that sign construction in designated wilderness as an activity becomes more complicated to those charged with performing that activity. The question of whether the signs themselves are good or bad is left to the reader to decide.

Levels of intensity for each impact topic were determined using the definitions presented below. All of the following intensities were expressed qualitatively.

**Natural Resources.** The intensity of impacts on natural resources was determined using the following definitions:

- *Negligible* – The impact would be either barely noticeable or extremely localized and would have no discernible effect on natural resources on a parkwide scale.
- *Minor* – The impact would be slight but noticeable and would affect only a small number of natural resources in a small number of park locations.
- *Moderate* – The impact would be clearly noticeable and spread over a number of park locations and would have an appreciable effect on natural resources.
- *Major* – The impact would be highly noticeable and widespread and could result in a substantial change in the park's natural resources.

**Cultural Resources.** The intensity of impacts on cultural resources was determined using the following definitions:

- *Negligible* – The impact would be either barely noticeable or extremely localized and would have no discernible effect on cultural resources on a parkwide scale.
- *Minor* – The impact would be slight but noticeable, with only a small number of resources in a small number of park locations being affected.
- *Moderate* – The impact would be clearly noticeable and spread over a number of park locations and would have an appreciable parkwide effect on cultural resources.
- *Major* – The impact would be highly noticeable and widespread and could result in the irretrievable loss of cultural resources within the park.

**Wilderness Resources.** The intensity of impacts on wilderness resources was

determined using the following definitions:

- *Negligible* – The impact would be either barely noticeable or extremely localized and would have no discernible effect on wilderness resources on a parkwide scale.
- *Minor* – The impact would be slight but noticeable and would affect only a small number of visitors in a small number of park locations.
- *Moderate* – The impact would be clearly noticeable and spread over a number of park locations and would have an appreciable effect on wilderness resources.
- *Major* – The impact would be highly noticeable and widespread and could result in a substantial change in the quantity of lands within the park possessing wilderness resources.

**Visitor Nonwilderness Experiences.** The intensity of impacts on visitor experiences not related to wilderness was determined using the following definitions:

- *Negligible* – The impact would be barely detectable by few visitors and would have no discernible effect on their experience.
- *Minor* – The impact would be slightly detectable by few visitors and would have little effect on visitor experiences not related to wilderness resources.
- *Moderate* – The impact would be clearly detectable by many visitors and would have an appreciable effect on visitor experiences not related to wilderness resources.
- *Major* – The impact would be severely adverse or exceptionally beneficial for the majority of visitors,

and would have a substantial, highly noticeable influence on various aspects of visitor experiences not related to wilderness resources.

**Park Operations.** The intensity of impacts on park operations was determined using the following definitions:

- *Negligible* – The impact would be barely detectable and would have little discernible effect on park operations and facilities.
- *Minor* – The impact would be slightly detectable but would not affect the park’s overall ability to provide services and maintain facilities.
- *Moderate* – The impact would be clearly detectable and could have an appreciable effect on park operations and facilities.
- *Major* – The impact would have a substantial, highly noticeable influence on park operations and facilities, and could change the park’s services and/or facilities.

## MITIGATION MEASURES, CUMULATIVE IMPACTS, AND RESOURCE IMPAIRMENT

### MITIGATION MEASURES

No impacts were identified due to wilderness designation that would require mitigation measures. It is assumed in the impact analyses that appropriate mitigation measures would be applied for developments that may be built in the nonwilderness areas under the alternatives. For example, sites would be surveyed for archeological resources and state-listed and rare plants before developments would be permitted. Developments in wetlands and in important wildlife habitats also would be avoided.

### CUMULATIVE IMPACTS

The Council on Environmental Quality regulations implementing NEPA define a cumulative impact as "...the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (federal or nonfederal) or person undertakes such other actions. Cumulative impacts can result from individually minor, but collectively significant, actions taking place over a period of time." Each cumulative impact analysis is additive, considering the overall impact of the alternative when combined with effects of other actions (inside and outside the park) that have occurred or that would occur in the foreseeable future.

The wilderness study team considered the potential of actions occurring within and outside the park, which when added to the designation of wilderness, could result in a cumulative impact. It should

be noted that there are no designated wilderness areas near the park, and wilderness areas in the region would attract different types of visitors than those who would come to the Apostle Islands. Also, no private or other agency actions were identified occurring on the mainland, such as in Bayfield, that, considered together with the designation of wilderness, would have a cumulative impact on resources, visitors, local economies, or management of the park.

Among the various actions considered in evaluating cumulative impacts were

- initiatives to outsource services provided by NPS staff. This is not likely to result in a cumulative impact with respect to wilderness designation.
- nationwide security efforts, which would likely result in law enforcement staff being directed to other duties outside the park, and in turn, fewer NPS staff being available to assist visitors which may affect the visitor experience. But this would not be expected to have a cumulative effect with wilderness designation.
- climate change, which could affect Lake Superior's water level. This could affect use of the park, possibly resulting in longer use seasons and more visitors, and could have both positive and negative impacts on park resources. But this effect would likely occur over time, and wilderness designation (plus changes in lake levels) would not result in additive changes in visitation, resources, or park operations.



- Native American treaty rights, which would continue to be honored by the National Park Service. Wilderness designation plus the exercise of the treaty rights would not result in any additive cumulative impacts on visitor uses or experiences on the islands, on island resources, or on park operations.
- granting of a new concessions contract for tour boats. This probably would not change existing use patterns of the park or substantially change use levels. Many of the visitors who use this service would not enter the wilderness area. Wilderness designation plus this change are independent actions and would not combine together to result in a cumulative effect on visitors or island resources.
- development of a new general management plan. It is uncertain what would be proposed in a new general management plan. Until Congress takes action on wilderness in the park, major changes in how much of the park would be managed would not be likely. Under NPS policy, wilderness values must be maintained in areas determined to have been suitable for wilderness until Congress takes action. Under this policy most new developments that could be proposed in a new plan would not occur in areas proposed for wilderness. Similarly, no major changes in visitor uses would likely be made in areas proposed for wilderness.

In conclusion, no ongoing or foreseeable actions were identified that would combine with proposals for wilderness that would result in cumulative effects. Therefore, it is expected that there would be no cumulative impacts (on the

impact topics being analyzed in this document) that would result from the designation of wilderness in Apostle Islands National Lakeshore. No further evaluation of cumulative impacts is included in this chapter.

## IMPAIRMENT OF PARK RESOURCES OR VALUES

In addition to determining the environmental consequences of the preferred alternative, *NPS Management Policies 2001* require that potential effects be analyzed to determine whether or not actions would impair park resources.

The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. NPS managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adversely impacting park resources and values. However, the laws do give the National Park Service the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given the National Park Service the management discretion to allow certain impacts within the park, that discretion is limited by the statutory requirement that the National Park Service must leave park resources and values unimpaired, unless a particular law directly and specifically provides otherwise.

The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values.

An impact to any park resource or value may constitute an impairment, but an impact would be more likely to constitute an impairment to the extent that it has a major or severe adverse effect on a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park
- key to the natural or cultural integrity of the park or opportunities for enjoyment of the park
- identified as a goal in the park's general management plan or other relevant NPS planning documents

Impairment may result from National Park Service activities in managing the park, visitor activities, or activities undertaken by concessioners, contractors, and others operating in the park.

## **Impairment Determination**

After evaluating the natural and cultural resource impacts for the four alternatives considered in this document, none of the impacts were found to be of sufficient intensity to constitute an impairment of park resources and values. Indeed, many of the resource impacts of wilderness designation were determined to be beneficial impacts. All adverse impacts due to wilderness designation were found to be moderate or lower in intensity and are not anticipated to be of sufficient magnitude to warrant a finding of impairment of park resources and values. From an impairment standpoint, impacts cannot be analyzed in the nonwilderness areas due to uncertainty regarding what actions might be taken where and when, and what resource values might be affected. Future actions in these areas would be evaluated for possible impairment of resource values in future environmental documents, consistent with the National Environmental Policy Act and NPS management policies.

## IMPACTS ON NATURAL RESOURCES

### ALTERNATIVE A (NO WILDERNESS)

**Analysis.** Under alternative A the current requirement to manage most of the park as *de facto* wilderness would be removed. As a result new developments could be built throughout the park, consistent with the general management plan. Thus, alternative A has the highest level of uncertainty of all the alternatives relative to impacts on the park's natural resources.

Under alternative A new docks could be built in most locations, consistent with the current general management plan. The development of additional docks in the park has the potential to cause moderate, long-term, adverse impacts on coastal processes. Docks, especially those with solid cores, impede transport of sediments along the shores. Sediments would be trapped by the docks and, therefore, would not be available to replenish downstream areas. Without this replenishment, Lake Superior currents and waves can erode beaches. Depending on the design, location, and extent of the docks, this could cause a moderate level of impact to the geomorphology of one or more of the park's sandscapes. The development of additional docks could also cause moderate, short-term, adverse water quality impacts during construction due to an increase in localized turbidity. In addition, new docks potentially could permanently modify the bottom substrate through the disturbance of nearshore transport of sediments. Both of these changes could cause long-term adverse impacts on fish habitat in very small areas, primarily confined to the

areas immediately surrounding the docks where the substrate has been changed.

Development of campsites along the shoreline could cause a minor level of impact to shoreline erosion, especially if campsites were grouped along a shoreline. People going back and forth across shorelines could trample vegetation, which in turn could increase shoreline erosion. Also, if an area becomes cleared of vegetation due to the creation of a campsite(s), and if there are trees behind the cleared area and the beach, the trees would be more subject to blowdown, which in turn could result in shoreline erosion.

The primary impacts on soils related to new campsites, trails, picnic areas, and buildings would be compaction and potential erosion. Depending on the level of new development, impacts could be moderate and long-term; however, individual impacted areas would tend to be small. Areas surrounding interpretive signs and kiosks could also be subjected to increased soil compaction.

The primary impacts on vegetation related to new campsites, trails, picnic areas, and buildings would be the loss of vegetation in the most heavily used areas and in surrounding areas. Similar to soils, impacts to vegetation could be moderate and long-term (depending on the level of development); however, individual impacted areas would tend to be small. Areas surrounding interpretive signs and kiosks could also be subjected to impacts on vegetation due to trampling.

Unless future developments were located in important habitat for sensitive species (a very unlikely situation), impacts would be expected to be negligible to minor on wildlife species.

**Conclusion.** Of all the alternatives considered, alternative A has the highest potential for adverse, long-term impacts to the park's natural resources — this alternative has the least certainty that the park's natural resources would continue to be protected and maintained as they have been. Depending on the level of development that occurred, minor to moderate, long-term, adverse impacts could occur in localized areas.

## **ALTERNATIVE B (MAXIMIZE WILDERNESS)**

**Analysis.** Designating 94% of the park's land base as wilderness would ensure that relatively few new developments would occur in undeveloped areas of the park. As a result, there would be relatively few natural resource impacts — compared to alternative A, alternative B would have a long-term, beneficial impact by ensuring that coastal processes, water quality, soils, vegetation, and wildlife would continue to be maintained in a relatively "natural" condition, or would not be altered beyond current conditions, on most of the islands. Although new campsites or trails could be built in the wilderness area, consistent with NPS wilderness management standards, no impacts to water quality would be expected. Some soil compaction would result from the construction and use of these facilities, and vegetation would be lost or trampled in these areas. Since there would likely be fewer campsites and trails constructed in the wilderness area compared to alternative A, these impacts

would be minor and long term and restricted to small areas. Impacts to wildlife would likely be negligible, given the size of the facilities, careful siting of the campsites and trails, and expected low-use levels.

New developments would largely be focused in the 6% of the park's land base that would not be designated as wilderness. Natural resources in many of these areas already have been disturbed or altered by past developments. If new developments are built in these areas, with appropriate mitigation measures few additional natural resource impacts would be likely. However, if developments such as docks, picnic areas, and buildings were built in undeveloped areas, impacts would be similar to those described under alternative A: minor to moderate, short and long-term, adverse impacts could occur to coastal processes, soils and vegetation, and negligible to minor impacts to wildlife populations.

**Conclusion.** Since this alternative would be the least likely to result in developments in currently undeveloped areas, it has the lowest potential for adverse, long-term impacts to the park's natural resources. Overall, compared to alternative A, alternative B would have a moderate, long-term, beneficial impact on natural resources because the increased protection wilderness would provide to most of the islands would ensure that potential impacts of new developments would largely be avoided. In the nonwilderness areas alternative B could result in negligible to moderate, short and long-term impacts to natural resources in localized areas, depending on the level of development that occurred.

## **ALTERNATIVE C (PREFERRED ALTERNATIVE)**

**Analysis.** Alternative C would have similar impacts as those described for alternative B, except a smaller area (80% of the park's land base) would be designated as wilderness. Like alternative B, alternative C would have a long-term, beneficial impact on most of the park's natural resources, ensuring long-term protection of coastal processes, water quality, soils, vegetation, and wildlife populations in the wilderness area. Some soil compaction could result from the construction and use of new campsites and trails in the wilderness area, some vegetation would be lost or trampled, and some wildlife could be disturbed, but these impacts would be localized, long term, and negligible to minor in intensity.

New developments could be built in 20% of the park's land base under alternative C, many of which are not currently developed. In particular, new developments could be built on Basswood, Sand, and Long Islands, and larger portions of Stockton and Rocky Islands, assuming this was consistent with the general management plan. If new developments were built in these undeveloped areas, impacts similar to those described under alternative A could occur: minor to moderate, short- and long-term, adverse impacts could occur to coastal processes, soils, and vegetation. Negligible to minor impacts could occur to wildlife populations.

**Conclusion.** Compared to alternative A, alternative C would have a moderate, long-term, beneficial impact for the park due to the additional level of protection wilderness would bestow to most of the islands and to ensuring that the potential impacts of new developments would

largely be avoided. Adverse impacts to natural resources in the wilderness area likely would be negligible to minor and long term. In the nonwilderness areas the alternative could result in negligible to moderate, short and long-term impacts to natural resources in localized areas, depending on the level of development that occurred. With more of the park potentially open to new development in this alternative, compared to alternative B, the natural resources in more areas could be adversely affected under alternative C, although much less than in alternative A.

## **ALTERNATIVE D (LIMIT WILDERNESS TO REMOTE AREAS)**

**Analysis.** Alternative D would have similar impacts as those described for alternative B, except a smaller area (55% of the park's land base) would be designated as wilderness. Like alternatives B and C, alternative D would have a long-term, beneficial impact on much of the park's natural resources, ensuring long-term protection of coastal processes, water quality, soils, vegetation, and wildlife populations in the wilderness area. As in the other alternatives, some soil compaction, loss of vegetation, and wildlife disturbance could result from the construction and use of new campsites and trails in the wilderness area, but these impacts would be localized, long term, and negligible to minor in intensity.

New developments could be built in 45% of the park's land base under alternative D, much of which is not developed. In particular, new developments could be built on the islands excluded from the wilderness area in

alternative C plus an additional nine islands, assuming this is consistent with the general management plan. If new developments were built in these undeveloped areas, impacts similar to those described under alternative A could occur: minor to moderate, short and long-term, adverse impacts could occur to coastal processes, soils, and vegetation; negligible could occur to minor impacts to wildlife populations.

**Conclusion.** Compared to alternative A, alternative D would have a minor to moderate, long-term, beneficial impact for the park due to the additional level of protection wilderness bestows to most of the islands and to ensuring that the potential impacts of new develop-

ments would largely be avoided. (The beneficial impact would be lower than alternatives B and C because less of the park would be designated as wilderness.) Adverse impacts to natural resources in the wilderness area likely would be negligible to minor and long term. In the nonwilderness areas the alternative could result in negligible to moderate, short and long-term impacts to natural resources in localized areas, depending on the level of development that occurred. With more of the park potentially open to new development in this alternative, compared to alternatives B and C, the natural resources in more areas could be adversely affected under alternative D, although less than in alternative A.

## IMPACTS ON CULTURAL RESOURCES

Analysis of the proposed alternatives' impacts on the cultural resources of the Apostle Islands is challenging. Most of the potential impacts identified are indirect and long term in nature. Many are related to the consequences of potential development, which wilderness designation would largely restrict to nonwilderness portions of the park.

Additionally, analysis of impacts on the cultural resources must consider several other factors:

- Most importantly, analysis of alternatives must take into account the fact that the park has not been completely surveyed for cultural resources, and additional sites may be identified as time passes. For example, only about 20% of the park's land area has been archeologically surveyed. Prior to implementing any ground-disturbing activity in the future, appropriate archeological surveys would be undertaken. The significance of any discovered archaeological resources would be evaluated and documented, and an appropriate mitigation strategy developed, if necessary, through consultation with the Wisconsin state historic preservation office and any affiliated American Indian tribes.
- The cultural resources of the Apostle Islands are not set off in a distinct, separate area; rather they are distributed widely throughout the park. Cultural features tend to cluster along the shoreline, where access is easiest. Consequently, those sites that are most appealing for modern

development also tend to be the spots where cultural features are most often found.

- The island setting resulted in special patterns of use and development, and contributed to the excellent state of preservation of early homesteads, logging camps, and quarry operations. Because access has always been difficult, island sites have escaped both the development and disturbance that have destroyed or damaged similar sites on the mainland throughout the northern Great Lake states.
- Progress in our understanding of the islands' history and cultural resources continues to affect the assessment of significance of cultural resources within the park. Sites that were once thought to lack significance have subsequently been identified as eligible for listing on the National Register of Historic Places; examples include the West Bay Club complex on Sand Island and the logging camp near the northeast cove on Bear Island. Thus, the current national register status of a site cannot serve as the sole measure of its historic significance. The Advisory Council for Historic Preservation (ACHP) offers this guidance:

When approaching questions of historical significance, build upon national register criteria as commonly applied to historic properties by drawing upon a wide range of scholarship in the agency's evaluative and interpretive frameworks. How do the agency's cultural landscapes

illustrate the continuum of human life? To what degree does the potentially affected area itself embody the qualities of a heritage resource? Would interpretation of the area's associated cultural traditions enrich understanding of the values inherent in the area? (ACHP 2002)

Thus, identification of cultural resources is an ongoing process. As time passes, scholarly and/or public thinking about the significance of cultural resources may change. The significance of cultural resources may require re-evaluation based on new information.

## **ALTERNATIVE A (NO WILDERNESS)**

**Analysis.** Pursuant to the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (NPS 1995), park managers would be able to choose between four alternative treatments for all historic structures within the park: preservation, rehabilitation, restoration, and reconstruction. Managers would be free from the restraints imposed by wilderness management policies on the general use of power tools and other equipment, and as a result could choose the most cost-effective tools and methods for the treatment of cultural resources, making it more likely that the cultural treatment would occur. This could have a minor to moderate beneficial effect, enhancing the level of protection available to the park's cultural resources, including resources that are not on the national register.

Alternative A would provide maximum flexibility for siting future developments and so would entail the least likelihood

for developments to be placed in such a way as to directly affect archeological resources or cultural landscapes. On the other hand, new developments could occur throughout the park, consistent with the general management plan in place at the time. New developments could result in increased numbers of visitors in areas that are currently lightly visited. Thus, there is an increased potential for disturbance of cultural resources that are located adjacent to or near any new development, which could have a minor to moderate, adverse impact on these resources.

Ethnographic resources would be protected by existing laws and policies, including the American Indian Religious Freedom Act, the Native American Graves Protection Act, §110 (sacred sites) of the National Historic Preservation Act, Executive Order 13007, and *NPS Management Policies* (2001), and thus would not likely be adversely affected under alternative A.

**Conclusion.** Under alternative A most of the park's cultural resources could be maintained. The alternative also would provide maximum flexibility in managing and preserving cultural resources, including flexibility in locating new developments to avoid cultural resource impacts. But even with this flexibility, of all the alternatives, alternative A has the highest potential for adverse, long-term impacts associated with increased visitation in more areas. Overall, depending on the level of development that occurred, alternative A would have the potential for minor to moderate, long-term, adverse impacts to cultural resources throughout the park.



## ALTERNATIVE B (MAXIMIZE WILDERNESS)

**Analysis.** Under this alternative, a substantial portion of the park's cultural resources would be included in wilderness.

In keeping with NPS wilderness management policies, future park managers would be limited in the tools they can use to rehabilitate, restore, or reconstruct historic structures within the wilderness area. There would be a greater likelihood that structures with potential to be listed on the National Register of Historic Places would be left to molder in the wilderness area, due to restrictions on the tools available for the treatment of these structures. In addition, *NPS Management Policies 2001* states that human-disturbed areas should be restored to natural conditions and processes, which might include the removal of structures that are not listed as historically significant. In a designated wilderness area it would be more likely that structures not currently listed on or eligible for the national register could be removed, consistent with this policy. The removal of structures could preclude future research that might lead to the reassessment of their significance and possible nomination to the national register. Consequently, a minor to moderate, adverse impact on cultural resources in the wilderness area would be anticipated.

Future development of park facilities would be restricted to the limited areas excluded from wilderness designation, approximately 6% of the park's land base. These areas, such as existing developments and lighthouse complexes, contain a high concentration of cultural resources. Construction of new

facilities in these areas and increased visitor use in these developments would almost certainly affect archeological sites and/or cultural landscapes, which could have a moderate, adverse impact on these resources.

Since this alternative has a low potential for new development in 94% of the park's land base, there would be a low potential for disturbance of cultural resource sites in those areas due to more dispersed visitation patterns. The relative inaccessibility that has protected the park's cultural resources so well over the years would have a high potential for continuing for most of the park under alternative B, resulting in a minor to moderate, beneficial impact.

Ethnographic resources would not likely be impacted under alternative B. Wilderness would prevent most new developments and thus ensure that the ethnographic resources' existing condition would be maintained. In all of the park ethnographic resources also would continue to be protected by existing laws and policies, including the American Indian Religious Freedom Act, the Native American Graves Protection Act, §110 (sacred sites) of the National Historic Preservation Act, Executive Order 13007, and *NPS Management Policies (2001)*, and thus would not be adversely affected by alternative B.

**Conclusion.** Compared to alternative A, alternative B would have the potential for a minor to moderate, long-term, beneficial impact on cultural resources due to the low potential for new development and more dispersed visitation patterns in the areas recommended for wilderness. However, with reduced flexibility in the tools that can be used to protect and manage cultural resources

in those areas, there could be long-term, minor to moderate adverse impacts to cultural resources if they were allowed to molder. There could also be a minor to moderate, long-term, adverse impact if structures were removed from the wilderness area. In the nonwilderness areas, additional long-term adverse impacts might occur due to new developments being built in areas where there are concentrations of cultural resources. Overall, alternative B would have the potential for minor to moderate, long-term, beneficial and adverse impacts in the wilderness area and moderate, long-term, adverse impacts in the nonwilderness areas.

### **ALTERNATIVE C (PREFERRED ALTERNATIVE)**

**Analysis.** Under this alternative, several areas containing substantial concentrations of cultural resources would be excluded from wilderness designation. The exclusion of Sand, Basswood, and Long Islands, along with small portions of Rocky and Stockton Islands, from wilderness designation would allow a full range of treatments for a diverse representation of cultural sites. In particular, this alternative would provide for flexibility in planning the preservation and interpretation of pioneer farmsteads on Sand and Basswood Islands; of historic stone quarries on Basswood and Stockton Islands; and of logging camps on Sand, Basswood, and Stockton Islands. It would allow consideration of a full range of treatments for historic structures in the settlements on Sand and Rocky Islands. Managers would be able to choose the most cost-effective tools and methods for treatment of cultural resources in these nonwilderness areas, making it more

likely that the treatment would occur. Thus, on the above islands alternative C would have the same minor to moderate beneficial effect as alternative A regarding efforts to restore, rehabilitate, or reconstruct historic structures.

As described under alternative B, under alternative C it is possible that structures not currently listed on or eligible for the national register could be removed from the designated wilderness area. The removal of structures could preclude future research that might lead to the reassessment of their significance and possible nomination to the national register. Although the potential impact would be less than in alternative B, because of the smaller wilderness area, compared to alternative A there could be a minor, adverse impact on cultural resources in the wilderness area.

Because 20% of the park's land base would be excluded from wilderness, there would be a broader range of options when planning future development, resulting in less pressure on individual locations. This would reduce the chances of adverse impacts to cultural landscapes and archeological sites in nonwilderness areas compared to alternative B. But compared to alternative A, alternative C could result in minor to moderate, long-term, adverse impacts on cultural resources if new developments were built near existing developments and visitation increased around the developments in the nonwilderness areas.

Since this alternative has a low potential for new development in 80% of the park's land base, there would be a low potential for disturbance of cultural resource sites in those areas due to more dispersed visitation patterns. The relative inaccessibility that has protected

the park's cultural resources so well over the years would likely continue for the majority of the park under alternative C, resulting in a minor to moderate, beneficial impact.

Ethnographic resources would not likely be impacted under this alternative. Wilderness would prevent most new developments and thus ensure that the ethnographic resources' existing condition would be maintained. In all areas, ethnographic resources also would continue to be protected by existing laws and policies, including the American Indian Religious Freedom Act, the Native American Graves Protection Act, §110 (sacred sites) of the National Historic Preservation Act, Executive Order 13007, and *NPS Management Policies (2001)*, and thus would not be adversely affected by alternative C.

**Conclusion.** Like all of the other alternatives, alternative C has the potential for a mix of beneficial and adverse impacts relative to cultural resources. Alternative C would have a minor to moderate beneficial impact in the wilderness area due to the low potential for long-term cultural resource impacts associated with new developments and increased visitation in the wilderness area. However, some minor adverse, long-term impacts could occur in the wilderness area due to the chance that some structures could be removed and due to reduced flexibility in the treatment options that would likely be used to manage and protect some cultural resources. Minor to moderate, long-term, adverse impacts could occur in the nonwilderness areas, depending on the level and location of new development that occurred. Overall, compared to alternative A, alternative C could have minor to moderate, long-

term, beneficial and adverse impacts on cultural resources in both the wilderness and nonwilderness areas.

## **ALTERNATIVE D (LIMIT WILDERNESS TO REMOTE AREAS)**

**Analysis.** The exclusion of 12 islands, along with portions of several others, from wilderness under alternative D would allow a full range of treatments for a diverse representation of cultural sites on those islands. The alternative would provide for flexibility in planning the preservation and interpretation of pioneer farmsteads on Sand and Basswood Islands; of historic stone quarries on Basswood, Hermit, and Stockton Islands; and of logging camps on Sand, Oak, Basswood, and Stockton Islands. It would allow consideration of a full range of treatments for historic structures in the settlements on Sand and Rocky Islands. Managers would be able to choose the most cost-effective tools and methods for treatment of cultural resources in the nonwilderness areas, making it more likely that the treatment would occur. Thus, on the above islands alternative D would have the same minor to moderate beneficial effect as alternative A regarding efforts to restore, rehabilitate, or reconstruct historic structures.

As in alternatives B and C, in alternative D it is possible that structures not currently listed on or eligible for the national register could be removed from the designated wilderness area. The removal of structures could preclude future research that might lead to the reassessment of their significance and possible nomination to the national register. Although the potential impact would be less than in alternatives B and

C, because of the smaller wilderness area, compared to alternative A there could be a minor, adverse impact on cultural resources in the wilderness area.

Because 45% of the park's land acreage would be excluded from wilderness designation, there would be a broader range of options when planning future development, resulting in less pressure on individual locations. This would reduce the chances of adverse impact to cultural landscapes and archeological sites in nonwilderness areas compared to alternatives B and C. But compared to alternative A, alternative D could result in minor to moderate, long-term, adverse impacts on cultural resources if new developments were built near existing developments and visitation increased around the developments in the nonwilderness areas.

Since this alternative has a low potential for new development in 55% of the park's land base, there would be a low potential for disturbance of cultural resource sites in those areas due to more dispersed visitation patterns. The relative inaccessibility that has protected the park's cultural resources so well over the years would likely continue for about half the park under alternative D, resulting in a minor beneficial impact.

Ethnographic resources would not likely be impacted under this alternative. Wilderness would prevent most new developments and thus ensure that the ethnographic resources' existing condition would be maintained. In all

areas, ethnographic resources also would continue to be protected by existing laws and policies, including the American Indian Religious Freedom Act, the Native American Graves Protection Act, §110 (sacred sites) of the National Historic Preservation Act, Executive Order 13007, and *NPS Management Policies (2001)*, and thus would not be adversely affected by alternative D.

**Conclusion.** Like all of the other alternatives, alternative D has the potential for a mix of beneficial and adverse impacts relative to cultural resources. Alternative D would have a minor beneficial impact in the wilderness area due to the low potential for long-term cultural resource impacts associated with new developments and increased visitation in the wilderness area. However, some minor, long-term, adverse impacts could occur in the wilderness area due to the chance that some structures could be removed and due to reduced flexibility in the treatment options that would likely be used to manage and protect some cultural resources. Moderate, long-term, adverse impacts could occur in the nonwilderness areas, depending on the level and location of new development that occurred. Overall, compared to alternative A, alternative D could have both minor, long-term, beneficial and adverse impacts on cultural resources in the wilderness area, and minor to moderate, long-term, adverse impacts in the nonwilderness area.

## IMPACTS ON WILDERNESS RESOURCES (INCLUDING THE VISITOR WILDERNESS EXPERIENCE)

For the purposes of this assessment, wilderness resources are defined as those qualities of the environment that people seek when they travel to federally designated wilderness areas. These qualities include minimal levels of development; opportunities for primitive, unconfined recreation; opportunities for solitude; and quiet.

### ALTERNATIVE A (NO WILDERNESS)

**Analysis.** Under this alternative new developments, such as visitor centers, docks, or concession-operated lodges, could be built in the park, provided the general management plan is in place at the time allowed for them. Under alternative A these developments could be placed in areas that are currently managed to protect wilderness resources. It would be unlikely that a substantial amount of new development would occur in the foreseeable future, given the park's purposes and significance, and the difficulty (and cost) in placing new developments on the islands. But if any new visitor or administrative development(s) were built in those areas, they would result in the loss of wilderness resources. There would be fewer opportunities in the park for visitors seeking solitude and primitive, unconfined recreation than at present. The apparent naturalness visitors see in the park would decline in the areas with development, and scenic views could be obstructed or degraded in localized areas. If transportation technology were to change in the future, allowing substantially more visitors to get to the islands, additional adverse

impacts would occur to the park's wilderness resources. Thus, under alternative A visitors seeking wilderness experiences would have fewer opportunities to find this experience in the park.

**Conclusion.** Of all the alternatives, alternative A has the highest potential for widespread, adverse, long-term impacts to wilderness resources. Depending on the level of development that occurred in undeveloped areas and the increase in visitation, there could be minor to major, long-term, adverse impacts to wilderness resources. However, these impacts would likely be localized, limited to the general vicinity of where the new developments are built. Ultimately, it is the *certainty* that the park will resemble its present wild and primitive character that is most at risk from this alternative — alternative A provides the least certainty that the park's wilderness resources would continue to be protected and maintained as they have been.

### ALTERNATIVE B (MAXIMIZE WILDERNESS)

**Analysis.** Under alternative B most of the park's land area would be designated wilderness. This would be a major, beneficial, long-term, impact, ensuring that most of the park's wilderness resources would be permanently protected and maintained. In most of the park there would be opportunities for visitors seeking solitude and primitive, unconfined recreation. Most of the park would appear relatively natural to visitors.

About 6% of the park's land base would be nonwilderness under this alternative and could experience additional development in the future. The vast majority of this land is contained within developed areas that this study has found to be unsuitable for wilderness designation. By definition, these lands possess few wilderness characteristics, so the impacts to wilderness resources under alternative B would be negligible. However, the few impacts that might occur could be long term.

**Conclusion.** Since wilderness designation is by definition intended to protect the area's wilderness resources, it stands to reason that alternative B would have a beneficial impact on the wilderness resources of Apostle Islands National Lakeshore. Compared to alternative A, alternative B would have a major, long-term, beneficial impact on the park's wilderness resources. There could be some negligible, adverse, long-term impacts to wilderness resources in the areas excluded under alternative B, assuming additional development occurred in undeveloped areas.

### **ALTERNATIVE C (PREFERRED ALTERNATIVE)**

**Analysis.** With 80% of the park's land base designated as wilderness under alternative C, most of the park's wilderness resources would be permanently protected — a major, long-term, beneficial impact. In most of the park there would be opportunities for visitors seeking solitude and primitive, unconfined recreation. Most of the park would appear relatively natural to visitors.

New developments could be built in 20% of the park's land area that would

be nonwilderness areas under alternative C. As in alternative B, some of these areas already have developments and were found to be unsuitable for wilderness designation, possessing few or no wilderness characteristics. Thus, impacts from new developments and/or increased use levels in these areas would have no impact on wilderness resources. However, the majority of the nonwilderness area acreage would be on Sand, Long, and Basswood Islands, as well as some additional small areas on other islands. If new developments were built on these islands, and/or use levels increased substantially due to changes in technology, there would be a long term, adverse impact to wilderness resources. Visitors going to those islands would find fewer opportunities for solitude and primitive, unconfined recreation. The apparent naturalness of the islands could be adversely affected and some scenic views could be degraded or obstructed. Consequently, minor to moderate, long-term, adverse impacts could occur to opportunities for solitude, primitive, unconfined recreation, and apparent naturalness in the nonwilderness areas on three of the park's 21 islands.

**Conclusion.** Compared to alternative A, alternative C would have a major, long-term, beneficial impact. Most of the park's wilderness resources (80%) would be permanently protected. In the nonwilderness areas, there would be the potential for minor to moderate, long-term, adverse impacts, depending on the level of development and use levels that occur. These adverse impacts would be mostly limited to Basswood, Sand, and Long Islands.

## ALTERNATIVE D (LIMIT WILDERNESS TO REMOTE AREAS)

**Analysis.** With 55% of the park's land base designated as wilderness in alternative D, over half the park's wilderness resources would be permanently protected — a long-term, moderate, beneficial impact. In much of the park there would be opportunities for visitors seeking opportunities for solitude and primitive, unconfined recreation. Much of the park would appear relatively natural to visitors.

New developments could be built in the 45% of the park's land base that would be nonwilderness areas under alternative D. As in alternatives B and C, some of these areas already have developments and were found to be unsuitable for wilderness designation, possessing few or no wilderness characteristics. Thus, impacts from new developments and/or increased use levels in these areas would have a negligible, long-term impact on wilderness resources. However, there would be the potential for a long-term, adverse impact on 12 islands: Basswood, Sand, Long, Oak, Otter, Rocky, South Twin, Devils, Manitou, Hermit, York, and Raspberry Islands. Many of these islands have good

opportunities for solitude and primitive, unconfined recreation, particularly in areas away from beaches and shorelines. If new developments were built in these areas, such as campgrounds or visitor contact stations, or use levels were to substantially increase due to changes in technology, these opportunities would decline and the areas would appear less natural to visitors. Consequently, minor to major, long-term, adverse impacts could occur to wilderness resources on a number of islands.

**Conclusion.** With 55% of the park's land base designated as wilderness, alternative D would have a moderate, beneficial, long-term impact on wilderness resources. In much of the park, visitors would be able to find opportunities for solitude and primitive, unconfined recreation in a fairly "natural" setting. However, in a large portion of the park (mostly 12 islands) there would be the potential for minor to major, long-term, adverse impacts to wilderness resources, depending on the level of development and/or increase in use levels that occurs. Ultimately, it is the *certainty* that the park would resemble its present wild and primitive character that is most at risk in the areas excluded from wilderness under this alternative.

## IMPACTS ON VISITOR NONWILDERNESS EXPERIENCES

Enjoying the park and its resources is a fundamental part of visitor experience. That experience is heightened when it progresses from enjoyment to an understanding of the reasons for a park's existence and the significance of its resources. Natural and cultural resources and park facilities provide opportunities for a variety of visitor experiences at Apostle Islands National Lakeshore. Many of these visitor experiences are not related to, nor dependent upon, wilderness resources (i.e., opportunities for solitude, opportunities for primitive and unconfined recreation, naturalness, and quiet). These types of visitor experiences might include, but are not limited to, such activities as camping, picnicking, swimming, socializing, and sunbathing. These activities might take place in a solitary, family, or group setting.

### ALTERNATIVE A (NO WILDERNESS)

**Analysis.** Compared to the other alternatives, alternative A would provide managers with the most flexibility for expanding current visitor experience opportunities or creating new ones. For example, the demand for group camping and/or day use facilities has been slowly but steadily increasing in recent years. Alternative A would provide the most flexibility to substantially increase the number of group campsites or create new day use areas. This would have a moderate beneficial impact on groups visiting the park in the long term.

All alternatives would allow the National Park Service to continue providing for the existing range of

recreational activities. But alternative A would allow the park staff to expand facilities and recreational opportunities to new areas. For instance, while all alternatives call for maintaining the existing docks on the islands, alternative A could allow the addition of new docks in currently undeveloped areas. Under alternative A, the present range of facilities (including picnic tables) would continue at individual campsites throughout the park. This alternative would also allow the maximum flexibility for a wider range of recreational activities and to consider adding paved trails and other accessible facilities in the islands, provided they were consistent with the general management plan in effect at the time. If new wayside exhibits and trails with interpretive signs were provided, visitors would have additional opportunities to learn about the park's stories and further understand the area's significance. This would provide a minor, long-term, beneficial impact for visitors seeking experiences not related to wilderness resources.

**Conclusion.** Alternative A would have a minor to moderate, long-term, beneficial impact on visitor experiences not related to wilderness resources. It would provide park managers with the highest degree of flexibility for expanding recreational facilities into new areas of the park.

### ALTERNATIVE B (MAXIMIZE WILDERNESS)

**Analysis.** Alternative B would limit the construction or expansion of certain new recreational facilities, such as trails with interpretive signs, group campgrounds, picnic areas, and visitor



centers, to the 6% of the park's land area not recommended for wilderness designation. Limiting most future visitor developments to such a small area could increase crowding and have a moderate, adverse impact on visitor nonwilderness experiences.

Implementation of this alternative could result in visitors having fewer new opportunities to learn about the park from nonpersonal interpretive media such as wayside exhibits or self-guided interpretive trails. Thus, visitors could have fewer potential opportunities to gain an understanding of the park and its significance than they would have under alternative A, although this could be partially addressed through increased reliance on brochures and other printed materials that visitors could pick up at trailheads. It is expected that this would have a negligible to minor, adverse impact on visitors.

Alternative B would preclude adding public docks to islands in the wilderness area where they currently do not exist. Implementation of this alternative also would mean picnic tables from 23 individual campsites and from one group campsite would be removed, since NPS policy precludes picnic tables in wilderness. These sites were used by 5,570 campers in 2002. Removing the tables could inconvenience these campers, resulting in a minor, adverse impact.

**Conclusion.** Compared to alternative A, alternative B would result in fewer opportunities to add picnic sites or group campsites in new areas under this wilderness proposal, which could adversely affect some visitors. While most existing recreational facilities would remain (with the exception of picnic tables in certain campsites), the

potential for substantial expansion of recreational or visitor use facilities would be limited under this alternative. Overall, compared to alternative A alternative B would have a long-term, moderate, adverse impact on visitor experiences not related to wilderness resources.

### **ALTERNATIVE C (PREFERRED ALTERNATIVE)**

**Analysis.** Alternative C would limit the construction and expansion of some recreational and visitor use facilities to the 20% of the park's land area not recommended for wilderness designation. The expansion of group campsites and picnic areas would be easier under this alternative than under alternative B, since the excluded area is larger and includes areas that are currently in high demand. But restricting options for these future visitor developments could increase crowding in a few areas and have a minor, adverse impact on visitor nonwilderness experiences.

Although all of the Apostle Islands are rich in human history, some are richer than others. The areas excluded from wilderness in alternative C were excluded largely due to their human history. In terms of telling the stories of the islands' early years, this alternative would provide the National Park Service with maximum flexibility in the areas where it is most needed. Of all the alternatives, alternative C has the most visible "edge" between wilderness and nonwilderness on the islands, which would provide more opportunities for the National Park Service to educate visitors onsite on the role that wilderness plays in shaping the American cultural and physical landscape. This would have a minor, beneficial impact on some visitors' experience.

Implementation of alternative C would mean that visitors potentially would have fewer opportunities to learn about the park from certain nonpersonal interpretive media (e.g., wayside exhibits) in the areas proposed for wilderness compared to alternative A, although this could be partially addressed through increased reliance on brochures and other printed materials. Wayside exhibits and interpretive signs would be possible, however, on Basswood and Sand Islands, where there is considerable evidence of past human activity and many important interpretive themes could be highlighted. Thus, it is believed that alternative C would have a negligible, adverse impact on visitors relying on personal and nonpersonal interpretive services to help them understand the park and its significance.

Under alternative C picnic tables from 13 individual campsites and from one group campsite would be removed, since NPS policy precludes picnic tables in wilderness. These sites were used by 3,953 campers in 2002. Removing the tables could inconvenience some campers. There also would be fewer opportunities to add group campsites in new areas on the islands compared to alternative A. Consequently, a minor, adverse impact on visitors' nonwilderness experiences would be expected.

**Conclusion.** Under alternative C existing recreational facilities would remain (with the exception of picnic tables in certain campsites), and the potential for substantial expansion of recreational or visitor use facilities would be limited. Compared to alternative B, alternative C would have less impact on visitor nonwilderness experiences, because visitors seeking these experiences would be able to find

them on more islands and possibly enjoy more services and facilities. These nonwilderness islands are places where the pressure for new facilities is high. Compared to alternative A, alternative C also could have a beneficial impact on some visitors' experience by providing more opportunities onsite for visitors to learn about the wilderness and nonwilderness stories of the Apostle Islands. Overall, alternative C would have a minor, long-term, adverse impact on visitor experiences not related to wilderness resources, compared to alternative A.

#### **ALTERNATIVE D (LIMIT WILDERNESS TO REMOTE AREAS)**

**Analysis.** Alternative D would limit the expansion of some recreational and visitor use facilities to the 45% of the park's land area not recommended for wilderness designation. As with alternatives B and C, potential new group campsites and/or day use areas for groups would be limited to these nonwilderness areas. With a much larger area excluded from wilderness, the potential for substantially expanding group campsites or picnic areas would be much higher in alternative D than in alternatives B and C (although potential opportunities would be lower than those afforded by alternative A). It is expected that the limits on new visitor facilities under alternative D would have a negligible adverse impact on visitor nonwilderness experiences.

Implementation of alternative D would mean that visitors would have potentially fewer opportunities to learn about the park from certain nonpersonal interpretive media (i.e., wayside exhibits) in the areas proposed for wilderness,

although this could be partially addressed through increased reliance on brochures and other printed materials. But as with alternative C, wayside exhibits and interpretive signs would be possible on Basswood and Sand Islands since they would be in nonwilderness areas. Most of the islands included in alternative D are expected to continue to be lightly visited, so it is believed that the adverse impacts on visitors who rely on personal and nonpersonal interpretive services to help them understand the park and its significance would be negligible.

Compared to alternative A, alternative D would provide more “edge” between wilderness and nonwilderness on the islands, which would provide more opportunities for the National Park Service to educate visitors on the role that wilderness plays in shaping American culture. This would have a minor beneficial impact on some visitors’ experience.

Under alternative D picnic tables from five individual campsites would be removed, since NPS policy precludes picnic tables in wilderness. These campsites were used by 852 campers in

2002. Removing the tables could inconvenience some campers, resulting in a negligible adverse impact.

**Conclusion.** Under alternative D most existing recreational facilities would remain (with the exception of picnic tables in certain campsites), and the potential for substantial expansion of recreational or visitor use facilities would be limited in 55% of the park’s land base. Although the flexibility of park managers to add additional recreational or visitor use facilities to new areas would be lower under alternative D compared to alternative A, the pressure to add new facilities on the islands in the alternative D wilderness proposal is expected to be very low. Alternative D also could have a beneficial impact on some visitors’ experience by providing more opportunities for visitors to learn onsite about the wilderness and nonwilderness stories of the Apostle Islands. Overall, compared to alternative A it is expected that alternative D would have a negligible, long-term, adverse impact on visitor experiences not related to wilderness resources.

## IMPACTS ON PARK OPERATIONS

Without exception, the National Park Service can accomplish its core mission in areas of designated wilderness. What changes in designated wilderness areas is *how* the mission gets accomplished. What follows is an analysis of the impacts to the park's major functions — interpretation and education, natural and cultural resource management, visitor and resource protection, and facility management — that would result from the four alternatives.

### ALTERNATIVE A (NO WILDERNESS)

**Analysis.** Under alternative A new trails with interpretive signs, wayside exhibits, and other permanent developments could be built throughout the park. Depending on the type and number of facilities, additional demands could be placed on the time and energy of the park's existing interpretive staff to operate and maintain these facilities, if additional staff were not hired. Even if volunteers were to run the facilities, park staff would still need to supervise these volunteers as well as run existing interpretive and educational efforts. Additional operational costs related to planning and design of these facilities also could be incurred. The effect on interpretive operations could range from minor to major, adverse impacts, depending on the type and number of facilities constructed.

The park staff's ability to respond to emergencies from additional fully-equipped, island-based locations could be enhanced under alternative A, although the need for such facilities is currently fairly low. This would be a negligible, beneficial impact. Should

future planning documents recommend any new developments, there would be increased costs associated with their planning, design, construction, and maintenance, and there may be an increased need for additional resource monitoring. This could have a minor to moderate, adverse impact.

The park's natural and cultural resource management staffs would have maximum flexibility in how their work is performed in this alternative, although an increase in the level of development in the park could substantially increase their workloads. As a result, a minor to moderate, beneficial impact on resource management operations would be anticipated to occur.

Likewise, facility management staff could choose from a full range of options in performing their work. For instance, in trail-clearing operations, the use of chainsaws and motorized vehicles would be possible, although park managers may choose different options. The construction and repair of park facilities that lie in areas currently being managed as *de facto* wilderness could be performed with fewer constraints under alternative A. Consequently, a minor to moderate, beneficial impact on facility management operations would be expected.

Current planning documents call for little or no expansion to the park's present level of development. This could change if alternative A were implemented, however. The resulting increase in management flexibility could result in an increase in the quantity and complexity of park facilities. This would increase facility management workloads and

could have moderate to major adverse impacts on the park's facility management operations, depending on the number and type of new developments, and whether or not new staff and funds would be available.

**Conclusion.** Alternative A would have beneficial impacts in that it would offer park staff the highest degree of flexibility for carrying out its various programs and operations. On the other hand, potential increased levels of development could have adverse impacts on the park's operations, primarily due to increased costs. Thus, alternative A could have both minor to moderate, long-term, beneficial impacts and minor to major, long-term, adverse impacts, depending on the number and type of developments that were built and changes in staffing and funding.

## **ALTERNATIVE B (MAXIMIZE WILDERNESS)**

**Analysis.** In many ways, the impacts of alternative B on park operations would be the opposite of those in alternative A.

Under alternative B, even if future budgets allowed, there would be fewer new places for nonpersonal interpretive media, such as wayside exhibits and trails with interpretive signs, and fewer new places to hold formal park programs in the undeveloped portions of the islands compared to alternative A. Foregoing these potential developments could reduce the extent of the park staff's future personal and nonpersonal interpretive services, which could result in minor, long-term adverse impacts on the park's interpretive operations. On the other hand, alternative B would likely result in lower operational costs than alternative A due to a smaller

interpretive infrastructure that would be largely confined to a few places in the park.

Under alternative B, the park's visitor and resource protection staff would have fewer opportunities to add new island-based facilities for the storage of equipment or for basing operations. Although this could decrease efficiency and increase the cost of operations in the short term, in the long term it is likely to make park operations less expensive, since there would be less infrastructure to plan, design, construct, and repair. There also would not be an increased need for additional resource monitoring associated with additional infrastructure. Consequently, a minor to moderate beneficial impact on resource management operations would be expected to occur.

Alternative B would offer the natural and cultural resource management staffs the least amount of flexibility in how their work is performed. But the minimized level of development that would occur in the park as a result of alternative B would also reduce some aspects of their workloads, such as compliance-related activities and some resource monitoring. This would result in a minor to moderate, beneficial impact.

Likewise, facility management staff would have fewer options in performing their work. In trail-clearing operations, for instance, the use of chainsaws and motorized vehicles would be possible only if it could be demonstrated that they are the minimum requirement for getting the work done. The potential for construction of park facilities that lie in areas proposed as wilderness would be sharply reduced, compared to alternative A, and the repair of existing facilities

(mostly cultural resources) would have to conform to NPS wilderness management principles as well as other NPS policies. Some additional staff time and effort would be needed to ensure that the proposed actions meet these policies. It is expected that this would result in a minor to moderate, adverse impact.

Of all the alternatives, alternative B would have the least likelihood that the park's present level of development would increase in the vast majority of the islands. Operational costs for some individual facility management activities could increase under this alternative, compared to alternative A, since there are generally fewer work methods to choose from in wilderness areas due to restrictions in the use of mechanized equipment. For example, trail crews equipped with traditional hand tools would not be able to work as efficiently as trail crews equipped with chainsaws. But overall costs associated with facility management could be lower, compared to alternative A, because there would be fewer areas where new infrastructure would be built in alternative B—costs would be lower if the amount of new infrastructure in the park was limited to a few already developed areas. Thus, there could be minor to moderate, adverse, and beneficial impacts associated with alternative B relative to facility management costs.

**Conclusion.** Alternative B would result in a mix of adverse and beneficial impacts. Management flexibility would be reduced in this alternative, resulting in fewer options, and in some cases, possible increased costs. Overall, however, it is believed that the park's operational costs would be lowest under this alternative, due to the likelihood of little or no new development in most

(94%) of the park's land base. Thus, compared to alternative A, alternative B could have a minor to moderate, long-term, beneficial impact on park operations, due to new developments mostly being confined to a few areas, and a minor to moderate, long-term, adverse impact due to decreased management flexibility and possible increased costs in managing the few facilities that are in the wilderness area.

## **ALTERNATIVE C (PREFERRED ALTERNATIVE)**

**Analysis.** Under alternative C there would be fewer new places where nonpersonal interpretive media, such as wayside exhibits and trails with interpretive signs, could be provided compared to alternative A. There also would be fewer new places to hold formal park programs. Foregoing these potential developments could reduce the extent of the park staff's future personal and nonpersonal interpretive services, and thus could have a minor, long-term, adverse impact on the park's interpretive operations. On the other hand, alternative C would be expected to have lower operational costs than alternative A due to the likelihood of a smaller interpretive infrastructure that is confined largely to existing developed areas.

The park's visitor and resource protection staff would have fewer opportunities to add new island-based facilities for the storage of equipment or for basing operations in the areas proposed as wilderness. The areas that are currently thought to need such facilities the most would be excluded from wilderness under alternative C, however. Thus overall, the adverse impacts to visitor and resource

protection operations would be negligible to minor at most.

Alternative C would provide the park's natural and cultural resource management staffs with considerably less flexibility in how their work is performed, compared to alternative A, although considerably more flexibility than under alternative B. The exclusion of the cultural resource-dense areas of Basswood and Sand Islands would enhance the National Park Service's ability to preserve or restore the cultural resources themselves, rather than just preserving their stories. Overall, the park would remain very lightly developed. This would help ensure that some aspects of the workloads for resource management staffs, such as compliance-related activities and some resource monitoring, would not substantially increase. Consequently, a minor to moderate, beneficial impact would be expected on these operations.

Alternative C would likely have a minor, adverse impact on facility management. Facility management staff would have fewer options in performing their work compared to alternative A, although the area in which the full range of options is available would be considerably larger than in alternative B. Except in non-wilderness areas, trail-clearing operations would not routinely use chainsaws and motorized vehicles, unless it could be demonstrated that they were the minimum requirement for getting the work done. The potential for construction of park facilities that lie in areas proposed as wilderness would be sharply reduced, and the repair of existing facilities in those areas (mostly cultural resources) would have to conform to NPS wilderness management principles as well as other NPS policies. Some additional staff time and

effort may be needed to ensure that the proposed actions meet these policies. However, alternative C would keep 20% of the park's land base as nonwilderness areas, so the adverse impacts associated with alternative B would be moderated.

Compared to alternative A, alternative C would have a sharply reduced likelihood that the park's present level of development would increase on most of the islands. Operational costs for some individual facility management activities could increase under this alternative, since there are generally fewer work methods to choose from in wilderness areas due to restrictions in the use of mechanized equipment. But alternative C would reduce the number of work areas where these cost increases would take place by excluding certain areas from wilderness. For example, many of the agricultural openings and quarries that the park staff desires to occasionally clear would be excluded in alternative C. This would enable the National Park Service to use the most efficient means available to maintain the clearings. In this way, many of alternative B's adverse impacts to the park's facility management operations would be moderated, resulting in a minor, adverse impact on operational costs.

**Conclusion.** To varying degrees, many of the beneficial effects of alternatives A or B would be true in alternative C as well, and many of the adverse impacts associated with those alternatives would be moderated in alternative C. Although alternative C would allow for new development in the nonwilderness areas, there would be only a limited number of new areas on a few islands where development could occur. This would give the park staff flexibility in the areas where the need is highest, and would help to ensure that the level of

development doesn't further overwhelm the capability of the park's staff to maintain it. Overall, compared to alternative A, alternative C would have a minor to moderate, long-term, beneficial impact on park operations due to ensuring that there would be fewer places where new developments could occur, and a minor, long-term, adverse impact due to decreased management flexibility (primarily on Basswood and Sand Islands) and possible increased costs in managing the wilderness area.

#### **ALTERNATIVE D (LIMIT WILDERNESS TO REMOTE AREAS)**

**Analysis.** Like alternatives B and C, alternative D would have fewer new places for nonpersonal interpretive media, such as wayside exhibits and trails with interpretive signs, and fewer new places to hold formal park programs compared to alternative A. Foregoing these potential new developments could reduce the extent of the park staff's future personal and non-personal interpretive services, and thus could have a minor, long-term adverse impact on the park's interpretive operations. But alternative D also would be expected to have lower operational costs than alternative A due to the likelihood of a smaller interpretive infrastructure.

The park's visitor and resource protection staff would have fewer opportunities to add new island-based facilities for the storage of equipment or for basing operations in the areas proposed as wilderness. The areas that are currently thought to most need such facilities would be excluded from wilderness under alternative D, however. Thus, the adverse impacts to

visitor protection operations would be negligible to minor at most.

Alternative D would provide the park's natural and cultural resource management staffs with considerably less flexibility in how their work is performed, compared to alternative A, although there would be considerably more flexibility than in alternatives B or C. The exclusion of the cultural resource-dense areas of Basswood and Sand Islands would enhance the National Park Service's ability to preserve or restore the cultural resources themselves, rather than just preserving their stories. Overall, the park would remain very lightly developed. This would help ensure that some aspects of the workloads for resource management staffs, such as compliance-related activities and some resource monitoring, would not substantially increase. Consequently, a minor to moderate, beneficial impact would be expected on these operations.

Alternative D would likely have a minor, adverse impact on facility management. Facility management staff would have fewer options in performing their work, compared to alternative A, although the area in which the full range of options were available would be considerably larger than in alternatives B or C. Except in nonwilderness areas, trail clearing operations would not routinely utilize chainsaws and motorized vehicles, unless it could be demonstrated that they are the minimum requirement for getting the work done. The potential for construction of park facilities that lie in areas proposed as wilderness would be sharply reduced compared to alternative A, and the repair of existing facilities in those areas (mostly cultural resources) would have to conform to NPS wilderness management principles as well as



other NPS policies. Compared to alternative A, some additional staff time and effort would be needed to ensure that the proposed actions meet these policies. However, alternative D would keep 45% of the park's land base as nonwilderness so the adverse impacts associated with alternative B would be considerably moderated.

Compared to alternative A, alternative D would have a reduced likelihood that the park's present level of development would increase beyond most of the existing developed areas, although it could increase on several individual islands. Operational costs for some routine facility management activities could increase under this alternative, since there would be generally fewer work methods to choose from in wilderness areas due to restrictions in the use of mechanized equipment. But alternative D would reduce the number of work areas where these cost increases would take place by excluding many areas from wilderness. In addition to excluding the agricultural openings and quarries discussed in alternative C, alternative D also would exclude a quarry on Hermit Island and logging camps on Oak Island. This would enable the National Park Service to utilize the most efficient means available to

maintain these resources, should the agency choose to actively maintain them in the future. Overall costs of park operations could increase in the long term due to the increased likelihood of new developments in the nonwilderness areas, however, resulting in a minor, adverse impact on operational costs.

**Conclusion.** Like alternative C, many of the beneficial or adverse impacts associated with alternatives A and B would be moderated in alternative D. Flexibility to add new developments or to perform work in the most efficient manner would be higher in this alternative than in any other except alternative A. But if new developments were to be built in the nonwilderness areas (45% of the park's land area), the increased amount of maintenance and resource monitoring that would be needed could make the park staff's job more difficult. Overall, compared to alternative A, alternative D would have minor, long-term, beneficial impacts on park operations, due to ensuring that there would be fewer places where new developments could occur, and a minor, long-term, adverse impact due to decreased management flexibility and possible increased costs in managing the wilderness area.

## OTHER REQUIRED IMPACT TOPICS

### UNAVOIDABLE ADVERSE IMPACTS

Unavoidable adverse impacts are defined as impacts that cannot be fully mitigated or avoided. For all of the park under alternative A, and for those areas not included in the wilderness proposals in alternatives B, C and D, there would be the potential for some unavoidable adverse impacts to natural and cultural resources and wilderness resources (solitude, naturalness), depending on the number and type of new developments that could be built in undeveloped areas and increases in use levels. These impacts could include in localized areas: changes to coastal processes, losses of soil and vegetation, loss of archeological resources and changes in cultural landscapes, loss of opportunities for solitude and primitive unconfined recreation, a decline in apparent naturalness, and also a loss of the ability to add new picnic areas and group campsites in certain locations. In wilderness areas the removal of picnic tables would be an unavoidable adverse impact for some visitors. Another unavoidable impact in wilderness areas could be a decrease in management flexibility and an increase in costs for some park operations. The potential for unavoidable adverse resource impacts would be highest in alternative A, because more areas potentially could be subject to future development, and lowest in alternative B, because future developments would be largely confined to very small areas. Alternatives C and D would have lower potentials for unavoidable adverse impacts than alternative A, but higher than alternative B, due to the size of the nonwilderness areas where new developments potentially could occur.

Wilderness designation in alternatives B, C, and D would result in no unavoidable adverse impacts to natural or cultural resources in the wilderness area. However, the removal of picnic tables from the wilderness area in the three alternatives could be an unavoidable adverse impact to some visitors' experience.

### IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

No actions would be taken as a result of any of the alternatives that would result in the consumption of nonrenewable natural resources or in the use of renewable resources that would preclude other uses for a period of time. Thus, there would be no irreversible or irretrievable commitments of resources in the park by the National Park Service.

### RELATIONSHIP BETWEEN SHORT-TERM USES AND MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

Under all of the alternatives the majority of the park would be protected in a natural state and would continue to be used for recreation. The National Park Service would continue to manage the area under all the alternatives to maintain ecological processes and native and biological communities, and to provide for outdoor recreational activities consistent with the preservation of natural and cultural resources. Any actions the National Park Service takes in the park would be intended to ensure that uses do not adversely affect the productivity of the biotic communities.

Under alternative A, there would be the potential for a reduction in long-term biological productivity in localized areas if new developments were built on the islands or mainland unit.

Compared to alternative A, wilderness designation under alternatives B, C, and D would help further ensure the long-term productivity of the areas proposed for wilderness. With the largest wilderness proposal, alternative B would provide the highest potential for ensuring long-term productivity, while alternative D, with the smallest proposal, would have the lowest potential (but higher than alternative A).

By minimizing future developments and other uses that can occur on the islands, the long-term biological productivity of the islands would be maintained in the three action alternatives. On the other hand, for those areas that are not included in the wilderness proposals in alternatives B, C, and D, there would remain the potential for future developments that could reduce or eliminate long-term biological productivity in localized areas. Alternative B would have the lowest potential for such a reduction, while alternative D would have the highest potential (albeit still lower than alternative A).

## CONSULTATION AND COORDINATION

*(Back of Divider Page Blank)*

## SUMMARY OF PUBLIC INVOLVEMENT

The National Park Service has sought the public's views on wilderness throughout the wilderness study process. The input was used to help identify the issues to be addressed in the environmental impact statement, and to identify and help shape the alternatives.

A "notice of intent" to prepare a wilderness suitability study and environmental impact statement for Apostle Islands National Lakeshore was published in the *Federal Register* (volume 66, number 198, pages 52151-52152) on October 12, 2001. The National Park Service held meetings, and issued press releases and Internet messages on the park's web site to provide opportunities for the public, agencies, and organizations to identify issues and concerns for the study (see below).

A total of 4,512 separate written comments were received through the mail, FAX, and the Internet between July 2001 (when the National Park Service held a public meeting on the study in Bayfield) and February 1, 2002, when the scoping comment period closed.<sup>1</sup> Two petitions also were also received, with a total of 895 names.

### WRITTEN COMMUNICATIONS AND THE INTERNET

A variety of techniques were used to keep the public informed about the wilderness

study and to solicit input. During the study process a mailing list of over 4,200 names was compiled. The list included officials from other state and federal governmental agencies, federal and state legislators, Indian tribal governments, local and regional governments, businesses, organizations, and interested citizens. A post card was mailed in the spring of 2002 asking people if they wanted hard copies of the study documents and encouraging use of the Internet to access the documents. The public mailing list was subsequently pared down to about 300.

Press releases were issued at key points during the study, including the initiation of the study (May 8, 2001), the announcement of the Bayfield scoping open house (July 17, 2001), an extension of the scoping comment period (November 20, 2001), another extension of the scoping period (January 9, 2002), and an announcement that the preliminary alternatives were ready for public input and a schedule of open houses (June 18, 2002).

The Internet was used extensively to publicize the study, inform people about the study and meetings, and provide a means for people to provide input.

The park's Internet web site (<http://www.nps.gov/apis/study.htm>) included all publications, messages on the status of the study, a timeline, a "frequently asked questions" section, and contacts for additional information.

---

1. Officially, the scoping comment period did not begin until the "notice of intent" was published in the *Federal Register* on October 12, 2001, but was extended to January 15, 2002, and then again to February 1, to provide the public with additional time to provide input to the NPS study team.

A newsletter was sent to the public in November 2001. This newsletter was an update on the study and was published shortly after the *Federal Register* notice of intent was published. It summarized comments that had been received to date, noted key issues and concerns, announced that the comment period had been extended, encouraged people to provide comments on the study, and provided a schedule for the project.

An alternatives workbook was published in May 2002 and also placed on the park's web site. The workbook summarized the purpose of the study and the scoping comments, provided responses to several concerns raised by the public during the scoping period, noted areas that the study had determined were not suitable for wilderness, and identified six preliminary alternatives. A schedule for the study and a comment response form were also included in the workbook. Approximately 1,000 copies of the alternatives workbook were printed and distributed to the mailing list and handed out at various meetings. In addition, the workbook was downloaded from the study web site nearly 3,000 times during the comment period. Between June 20 and August 1, 2002, when the comment period closed, a total of 1,784 written comments were received via response forms, letters, e-mails, and faxes.

## **PUBLIC, AGENCY, AND ORGANIZATIONAL MEETINGS**

The study team held many meetings during the course of the study. At the beginning of the study (2001), park staff met with a variety of local, state, and tribal agencies and governments to identify issues and concerns for the study, including the State of Wisconsin Historic Preservation Office (July 31, 2001), Bad River and Red Cliff Bands of Lake

Superior Chippewa (June 21 and June 29, 2001), Voigt Intertribal Task Force of the Great Lakes Indian Fish and Wildlife Commission (September 6, 2001), United States Fish and Wildlife Service (December 18, 2001), United States Geological Survey (December 18, 2001), Wisconsin Department of Natural Resources (September 13, 2001), Bayfield County Board of Supervisors (June 26, 2001), Mayor of Ashland (June 28, 2001), Bayfield City Council (July 18, 2001), Chair of the Town of La Pointe (July 23, 2001), Town of Russell Board of Supervisors (August 14, 2001), and the Ashland Chamber of Commerce (June 28, 2001).

On July 25, 2001, a public open house was held in Bayfield, Wisconsin, to identify the public's issues and concerns regarding designating wilderness in the Apostle Islands National Lakeshore. A total of 78 people attended.

After the preliminary alternatives workbook was distributed, the study team held more meetings with the public, governments, agencies, and organizations. On May 16, 2002, letters of invitation were sent to the following governments, agencies, and organizations inviting them to meet with study team members during the 2002 alternatives workbook comment period:

- Ashland County Board of Supervisors
- Bayfield County Board of Supervisors
- Red Cliff Band of Lake Superior Chippewa Indians
- Bad River Band of Lake Superior Tribe of Chippewa Indians
- Bay Mills, Bois Forte, Fond du Lac, Grand Portage, Keweenaw Bay, Lac Courte Oreilles, Lac du Flambeau, Lac Vieux Desert, Mille

- Lacs, Mole Lake, and St. Croix Bands of Chippewa Indians
- Great Lakes Indian Fish and Wildlife Commission
- Cities of Ashland, Bayfield, and Washburn
- Towns of Bayfield, La Pointe, Russell, and Sanborn
- Chambers of Commerce of Ashland, Bayfield, and Washburn
- State of Wisconsin
- United States and state of Wisconsin senators and representatives

Invitations to meet were also extended to the Wisconsin State Historic Preservation Office, the Wisconsin Department of Natural Resources, and the U.S. Fish and Wildlife Service. Informal invitations were extended to numerous civic organizations, boating organizations, and user groups during the course of the comment period.

Park staff met with all entities that responded to the invitation, including the Lac du Flambeau, Lac Vieux Desert, Red Cliff, and Bad River Bands of Chippewa Indians (June 10, June 14, June 18, and July 3, 2002, respectively), Voigt Intertribal Task Force of the Great Lakes Indian Fish and Wildlife Commission (June 6, 2002), Ashland County Board of Supervisors (July 24, 2002), Bayfield City Council (June 12, 2002), Bayfield Chamber of Commerce (June 19, 2002), Town of Russell Board of Supervisors (July 22, 2002), Town of Bayfield Board of Supervisors (July 15, 2002), staff at local marinas (June 20, 2002), Bayfield Yacht Club (July 27, 2002), Duluth Power Squadron (September 19, 2002), and the Pikes Creek Keel Club (October 5, 2002). In addition, park staff met with the Wisconsin state preservation office on December 9, 2002.

The study team held five public open houses during the summer of 2002 to seek public views, concerns, and issues regarding the preliminary alternatives. The open houses were held July 5 at the Stockton/Presque Isle Visitor Center in Apostle Islands National Lakeshore, July 8 at Odanah, Wisconsin, July 9 at Bayfield, Wisconsin, July 10 at Red Cliff, Wisconsin, and July 11 at Saint Paul, Minnesota. About 175 people attended the five meetings.

## CONSULTATIONS WITH NATIVE AMERICAN TRIBES

As noted above, several meetings were held with various Indian tribes from both an on-and off-reservation perspective. At each of these meetings, park staff assured tribal leaders that the tribes' rights would continue to be honored regardless of whether wilderness eventually is designated by Congress. Both the Red Cliff and Bad River bands recommended that guarantees of those rights be specifically inserted into any legislation that might be drafted for wilderness designation. In addition, the Bad River Band expressed concern over Long Island (known to the tribe as Chequamegon Point) being included within designated wilderness.

As for off-reservation issues, the Great Lakes Indian Fish and Wildlife Commission's Voigt Intertribal Task Force and the park formed a joint workgroup which met on more than 10 occasions and thus provided a forum for ongoing and recurring consultation. The Task Force, which consists of nine tribes that signed the 1842 treaty, neither specifically endorsed nor rejected a wilderness designation for the park provided that the park's recommended alternative would in no way abrogate or diminish their treaty rights guaranteed in that treaty. Among other



things, the joint Task Force/park workgroup explored ways in which the park could be administered and preserved consistent with the tribes' rights and provided recommended language for inclusion in this document toward that end.

### **CONSULTATION WITH THE WISCONSIN STATE HISTORICAL PRESERVATION OFFICE (SHPO)**

Members of the study team met three times with compliance staff in the Wisconsin State Historical Preservation Office. The SHPO staff acknowledged that wilderness is very protective of archeological resources due to the low likelihood of ground disturbance, but also expressed concern that wilderness designation may make it more difficult to perform archeological surveys in the future. The SHPO staff was also concerned that management's flexibility to choose certain treatment options (such as restoration or reconstruction) would be limited in designated wilderness. They believe this may result in an increased likelihood that certain cultural resources would be left to molder in the field.

The SHPO staff was mailed a copy of the draft document in July 2003. They provided no comments on the draft study.

### **CONSULTATIONS WITH THE U.S. FISH AND WILDLIFE SERVICE (USFWS)**

The study team initiated informal consultation with the Endangered Species Field Office of the U.S. Fish and Wildlife Service in Green Bay, Wisconsin, in June 2001. The Fish and Wildlife Service has indicated that due to the nature of wilderness, the threatened or endangered species

known to exist in the park will not be affected (see appendix B).

### **COASTAL ZONE CONSISTENCY DETERMINATION**

Federal agency activities in or affecting Wisconsin's coastal zone must comply with §307 of the Coastal Zone Management Act and implementing regulations, which require that such federal activities be conducted in a manner consistent to the maximum extent practicable with Wisconsin's Coastal Management Program.

Although all of Apostle Islands National Lakeshore is federal land and excluded from Wisconsin's coastal zone, the park is geographically within the coastal zone. The National Park Service has determined that the preferred alternative described in this document is consistent with Wisconsin's Coastal Management Program, including the state's goals and policies for this area.

This final wilderness study/EIS provides the substantive basis for the National Park Service's consistency determination and it has submitted this document to the Wisconsin Coastal Management Council for its concurrence. This consistency determination and the Council's concurrence complies with the requirements of the Coastal Zone Management Act. If the state of Wisconsin concurs with the National Park Service's consistency determination, it will transmit its formal concurrence, which will be acknowledged in the record of decision for the wilderness study.

## **PUBLIC OFFICIALS, AGENCIES, AND ORGANIZATIONS TO WHOM COPIES OF THE FINAL STUDY WERE SENT**

The National Park Service is circulating the *Final Wilderness Study/Environmental Impact Study* to the agencies and organizations listed below. A limited number of copies of the wilderness study are available upon request by interested individuals. Copies of the document are also available for review at the park, on the Internet (<http://www.nps.gov/apis/wstudy.htm>) and at libraries.

(An asterisk [\*] indicates that a comment on the *Draft Wilderness Study / Environmental Impact Statement* was received from this organization.)

### **CONGRESSIONAL DELEGATION**

Representative David Obey  
Senator Russell Feingold  
Senator Herb Kohl

### **STATE AND LOCAL ELECTED OFFICIALS**

Representative Gary Sherman  
Senator Bob Jauch

### **FEDERAL AGENCIES**

Advisory Council on Historic Preservation  
Army Corps of Engineers  
Great Lakes Commission  
Natural Resource Conservation Service  
Northern Great Lakes Visitor Center  
U.S. Department of Agriculture  
Forest Service  
Chequamegon-Nicolet  
National Forests

U.S. Department of the Interior  
Bureau of Indian Affairs  
National Park Service  
Grand Portage National Monument  
Ice Age and North Country  
National Scenic Trails  
Keweenaw Historical Park  
Indiana Dunes National Lakeshore  
Isle Royale National Park  
Midwest Archaeological Center  
Pictured Rocks National Lakeshore  
Saint Croix National Scenic Riverway  
Sleeping Bear Dunes National Lakeshore  
Voyageurs National Park  
U.S. Fish and Wildlife Service, Endangered Species Field Office, Green Bay  
U.S. Coast Guard  
U.S. Environmental Protection Agency, Region 5\*

### **NATIVE AMERICAN TRIBES AND AGENCIES**

Chippewa Indian Bands  
Lac du Flambeau  
Lac Vieux Desert  
Lac Courte Oreilles  
Red Cliff  
Bad River  
Bay Mills  
Bois Forte  
Fond du Lac  
Grand Portage  
Keweenaw Bay  
Mille Lacs  
Mole Lake  
St. Croix

Voigt Intertribal Task Force of the Great  
Lakes Indian Fish and Wildlife  
Commission

## **STATE OF WISCONSIN AGENCIES**

Department of Natural Resources  
Department of Tourism  
Natural Resources Board\*  
Northwest Regional Planning Commission  
Office of the Governor\*  
State Historical Preservation Office  
State Historical Society  
Wisconsin Coastal Management Program\*

## **LOCAL AND REGIONAL GOVERNMENT AGENCIES**

Ashland County Board of Supervisors  
Bayfield County Board of Supervisors  
Bayfield County Forest  
City of Ashland  
City of Bayfield  
City of Washburn  
Town of Bayfield\*  
Town of Bell  
Town of LaPointe  
Town of Russell\*  
Town of Sanborn

## **ORGANIZATIONS AND BUSINESSES**

Adventures in Perspective  
Alliance for Sustainability  
Animaashi Sailing Company  
Apostle Islands Cruise Service  
Apostle Islands Marina  
Ashland Chamber of Commerce  
Ashland Marina  
Association of Wisconsin  
Snowmobile Clubs  
Bayfield Chamber of Commerce\*  
Bayfield Heritage Association  
Bayfield Yacht Club  
Bruce River Canoe Rental  
Camp Amnicon

Camp Manio-wish  
Camp Voyageur  
Catchun-Sun Charter Co.  
Chequamegon Adventure Company  
Chequamegon Audubon Society\*  
Citizens Against Apostle Islands  
Wilderness\*  
Duluth Power Squadron  
Friends/Boundary Waters Wilderness\*  
Glacier Valley Wilderness Adventures  
Great Lakes Cruising Club  
Great Lakes Sport Fishing Council  
Howard County Bird Club\*  
Izaak Walton League\*  
Madeline Island Chamber of Commerce  
National Audubon Society  
National Park Foundation  
National Parks Conservation Association\*  
National Trust for Historic Preservation  
National Wildlife Federation  
Northland College  
NW Passage Outing Club, Inc.  
Public Employees for Environmental  
Responsibility (PEER) \*  
Pikes Bay Marina  
Pikes Creek Keel Club  
Port Superior Marina  
Red Cliff Marina  
Roberta's Charters  
Sailboats, Inc.  
Schooner Bay Marina  
Sierra Club  
Midwest Office  
John Muir Chapter\*  
Siskiwit Bay Marina  
Superior Charters, Inc.  
Superior Sailor  
The Nature Conservancy  
Trek and Trail  
University of Minnesota  
Voyageur Outward Bound School  
Washburn Chamber of Commerce  
Washburn Marina  
Wilderness Inquiry  
Wilderness Society\*

## **LIBRARIES**

Ashland Public Library  
Duluth Public Library  
University of Minnesota, Forestry Library  
University of Wisconsin, Madison  
(Steenbock Library)  
Washburn Public Library

## **MEDIA**

County Journal  
The Daily Press  
Duluth News-Tribune  
Ironwood Daily Globe  
The Journal  
The Journal Times

KADL Radio  
KBJR TV Duluth  
KDLH TV Duluth  
Lake Superior Magazine  
Madison Capitol Times  
Milwaukee Journal Sentinel  
Minneapolis Star Tribune  
The Outdoor Network  
St. Paul Pioneer Press  
Superior Evening Telegram  
WATW (AM 1400)  
WDIO TV, Duluth  
WDSE TV, Duluth  
WEGZ Eagle 106  
Wisconsin Public Radio

## PUBLIC REVIEW OF THE DRAFT WILDERNESS STUDY/ENVIRONMENTAL IMPACT STATEMENT

This section includes a summary of comments received through letters, e-mail messages, and public meetings following the release of the *Draft Wilderness Study/Environmental Impact Statement* on July 11, 2003. All oral and written comments were considered during the preparation of the *Final Environmental Impact Statement* according to the requirements of 40 CFR 1503. The comments allow the study team, NPS decision-makers, and other interested parties to review and assess the views of other agencies, organizations, and individuals regarding the preferred alternative, the other alternatives, and their potential impacts. *It is important to stress that the selection of the preferred alternative and any revisions to the alternative were not based solely on how many people supported a particular alternative.*

The section begins with summaries of the public meetings and written comments. Next, comment letters from all federal, state, and local agencies, and private organizations are reproduced and responses are included for all substantive comments. In addition, responses are provided for other agency, organization, and individual comments the study team believed merited a response (e.g., comments that reflected misinformation or misperceptions).

Where appropriate, the text in the *Final Environmental Impact Statement* has been revised to address the comments. These changes are identified in the NPS responses. No response was given to comments simply expressing preference for an alternative.

The Council on Environmental Quality guidelines (1978) for implementing the National Environmental Policy Act require the National Park Service to respond to “substantive comments.” A comment is substantive if it meets any of the following criteria from Director’s Order 12, “Conservation Planning, Environmental Impact Analysis and Decision-Making” (NPS 2001).

- It questions, with reasonable basis, the accuracy of information.
- It questions, with reasonable basis, the adequacy of environmental analysis.
- It presented reasonable alternatives other than those proposed in the environmental impact statement.
- It would cause changes or revisions in the preferred alternative.

Most comments from individuals expressed opinions about the preferred alternative and therefore were not responded to or reproduced in this document. (A complete record of individuals who received copies of the draft document and of comments received on the draft study, including copies of all letters and e-mail messages, is on file at the park headquarters. People wishing to review the comment letters should contact the wilderness study coordinator: Route 1, Box 4, Bayfield, WI 54814; 715/779-3398, x102.)

## RECORD OF PUBLIC COMMENT

A notice of availability of the draft document was published in the *Federal Register* on July 11, 2003 (68 FR 41398-41399). Approximately 300 copies of the draft were distributed to government agencies, public interest groups, businesses, media, local libraries, and individuals. The document was also posted on the park's Internet web site for review.

Written comments on the draft document were accepted for over 90 days. The public comment period closed on October 17, 2003. In addition, nine public meetings were held in July and August to solicit public input, and one formal public hearing was held on August 27. Notice of the public hearing was published in the local newspapers.

## SUMMARY OF THE PUBLIC, AGENCY, AND ORGANIZATIONAL MEETINGS

A series of public open houses were held at Stockton Island in the park (July 26, 2003), at park headquarters (July 29), and in Red Cliff (July 30), Odanah (August 4), LaPointe (August 11), and Ashland, Wisconsin (August 14). Open houses were also held in Duluth (August 5) and St. Paul, Minnesota (August 19), and in Madison, Wisconsin (August 20). A total of 139 people attended the open houses. The vast majority of the people attending the open houses did so because they were interested in learning more about the study and its alternatives. Many questions were answered, and while many of the conversations were lengthy and informative, very few oral comments were received. Most attendees stated a desire to comment in writing after thinking more about the alternatives and studying the document.

One person commented at the Stockton Island open house that to maximize flexibility with respect to docks in the future, the wilderness boundaries should be drawn around all areas where docks have existed historically.

In accordance with Wilderness Act requirements, a formal public hearing was held at the Northern Great Lakes Visitor Center near Ashland, Wisconsin, on August 27, 2003. The hearing officer was the Regional Director of the NPS Midwest Region, Ernie Quintana. Participants had the opportunity to speak for five minutes, and their comments were recorded and transcribed by a professional court reporter. In all, 18 persons spoke at the hearing; 12 of them supported wilderness (one supported alternative B, eight supported alternative C, one supported a modified alternative C, and two supported wilderness without expressing a preference for a particular alternative), four of them were opposed to wilderness (alternative A), and two had no discernible opinion. Copies of the hearing transcripts can be viewed at Apostle Islands National Lakeshore headquarters in Bayfield.

Finally, park staff was invited to speak and answer questions at a number of meetings. Attendees included: Institutes for Journalism in Natural Resources, Alliance for Sustainability Steering Committee, Inland Sea Society, Wisconsin Natural Resources Board, Bayfield Brunch Bunch, Ashland Chamber of Commerce, Ashland/Bayfield League of Conservation Voters, Bayfield Chamber of Commerce, Ashland/Bayfield Republican Committee, and League of Women Voters. Park staff also met with the Red Cliff Tribal Council, the Voigt Intertribal Task Force, Town of Russell Board of Supervisors, Bayfield County Board of Supervisors, Bayfield City Council, and the Town of Bayfield.

Information was provided at these meetings which these organizations or government bodies used in the preparation of written comments.

## **SUMMARY OF THE WRITTEN COMMENTS**

The wilderness study team received over 3,500 separate written responses during the comment period, including letters, FAXes, postcards, e-mail comments, and written comments provided at the public hearing. Of those responses, 19 were from agencies and organizations, including one federal agency, the governor of Wisconsin, two state agencies, two local governments, eight conservation groups, and four other special interest groups. All of the other responses were from individuals and businesses. Comments were received from across the country.

The overwhelming majority of commenters supported wilderness being designated in the park, with most supporting more wilderness (alternative B) than in the preferred alternative (alternative C). The largest number of commenters (35% of the total), including the National Parks Conservation Association, Wilderness Society, and Chequamegon Audubon Society, supported the alternative C wilderness proposal with the addition of Basswood Island (except for the quarry and dock). Including Basswood Island would add another 4.5% of the park's land base into the wilderness proposal. These commenters believed that this revision would provide continued opportunities to interpret the island's cultural resources while providing permanent wilderness protection to the island. Another large group (33% of the total response), including the Izaak Walton League, PEER, and the Ecotopian Society, supported the

maximum wilderness proposal (alternative B). Many commenters, including the Bayfield Chamber of Commerce, supported the preferred alternative. A number of other commenters supported the preferred alternative with other modifications or conditions. The Sierra Club favored adding two-thirds of Sand Island and most of Basswood Island into the wilderness proposal. The town of Bayfield supported the preferred alternative with the condition that the National Park Service define water or access level to the islands so access is available at all times regardless of water level. A small group of commenters, including the governor of Wisconsin, favored the designation of wilderness but did not specify which alternative they favored.

A handful of commenters, including the town of Russell and Citizens Against Apostle Islands Wilderness, opposed wilderness, arguing that the park does not qualify as wilderness, that this would satisfy only a few elitists, and that current management without wilderness is working fine. A couple people also supported less wilderness being designated than in the preferred alternative.

Finally, a group of commenters wrote supporting the exclusion of Sand Island from the wilderness proposal.

Although written comments were not received from Bayfield County or the Voigt Intertribal Task Force, it is known that the Bayfield County Board approved a resolution opposing wilderness, and the Voigt Intertribal Task Force continues to have concerns related to the impacts wilderness might have on the exercise of their treaty-reserved hunting, fishing, and gathering rights. National Park Service

staff remain committed to finalizing an agreement with the affected tribes to define the scope of these rights in a mutually satisfactory manner, whether wilderness is ever designated in the Apostle Islands or not.

## COMMENTS AND RESPONSES

This section includes all written comments from governmental agencies, organizations, and substantive written and oral comments from individuals. Because of the volume of written comments received, individuals with substantive comments that were identical or similar to comments from organizations, or whose comments were addressed in the responses to organizations, were not reproduced. The National Park Service's responses to all substantive comments are also included in this section. Some comments required text modifications, which have been made in the final EIS. These changes are identified in the NPS responses. All page number citations refer to the draft EIS.

Below is a list of the agencies, organizations, and individuals that are included in this document in the order that they appear. Page numbers are included after each commenters name.

### Agencies

U.S. Environmental Protection  
Agency 115  
Hon. Jim Doyle, Governor, State of  
Wisconsin 116  
Wisconsin Department of  
Administration 117  
Wisconsin Natural Resources Board 117

Town of Bayfield 119  
Town of Russell 120

### Organizations

Ashland-Bayfield County  
League of Women Voters 121  
Bayfield Chamber of Commerce 122  
Chequamegon Democratic Party 122  
Chequamegon Audubon Society 123  
Citizens Against Apostle Islands  
Wilderness 124  
The Ecotopian Society 127  
Friends of the Boundary  
Waters Wilderness 128  
Howard County Bird Club 134  
Izaak Walton League 135  
National Parks Conservation  
Association 138  
PEER 142  
Sierra Club – John Muir Chapter 145  
The Wilderness Society 148

### Individuals

Betty Good 149  
Harold C. Jordahl, Jr. 150  
Emmet Judziewicz 156  
Maureen Kinney 158  
John C. Laney 159  
M.L. 160  
Brandt Mannchen 162  
Sumner Matteson 169  
M. James Nemec 171  
Celeste Peltier 172  
Sheree L. Peterson 176  
Gerritt Rosenthal 179  
Richard Spotts 180  
Albert Swain 182  
Unnamed commenter 183  
Bryan Wyberg 184  
Oral comment at Stockton  
Public Meeting 186







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

OCT 09 2003

REPLY TO THE ATTENTION OF:

B-19J

Bob Krumenaker, Superintendent  
Apostle Islands National Lakeshore  
Rt. 1, Box 4  
Bayfield, Wisconsin 54814  
Attention: Wilderness Study

**Subject: Comments on the Draft Environmental Impact Statement and Wilderness Study for the Apostle Islands National Lakeshore, Bayfield Area, Wisconsin**

Dear Mr. Krumenaker:

The U.S. Environmental Protection Agency Region 5 (U.S. EPA) has reviewed the National Park Service's (NPS) Draft Environmental Impact Statement (DEIS) and Wilderness Study for the for the Apostle Islands National Lakeshore, Bayfield Area, Wisconsin. Our review and the comments that follow are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. The CEQ's number for this DEIS is 030314.

During the scoping process for this project, the public raised several major issues and concerns around the issue of wilderness designation. These concerns included:

- The impact of potential new developments on the islands;
- Changes in park access;
- Changes in visitor uses and experiences;
- Impacts to local communities and economies;
- Impacts on Native American treaty rights;
- Protection of cultural resources, and
- Changes in park operations.

The NPS analyzed three action alternatives (Alternatives B, C, and D) and a No Action alternative (A) in the DEIS. Alternative C is the Preferred Alternative and has also been chosen as the NPS's Environmentally Preferred Alternative. All three action alternatives designate most of the National Lakeshore as wilderness, with Alternative C designating 80% of the available land. Although Alternative B would capture more land in wilderness areas (94%), it lacks Alternative C's very appropriate emphasis on minor development for cultural and interpretive education for the visiting public.

Having reviewed the DEIS, U.S. EPA rates "C," the Preferred Alternative, **LO, Lack of Objections**. The LO rating indicates that we do not have concerns about the project impacts or the amount of information the NPS has supplied in support of their impact analysis. We appreciate the opportunity to review the DEIS. Please send only two copies of the final EIS to this office at the same time it is officially filed with our Washington, D.C. Office. If you have any questions, please call Rosalyn Johnson at (312) 353-5692, or send email to johnson.rosalyn@epa.gov.

Sincerely,

Kenneth A. Westlake  
Chief, Environmental Planning and Evaluation Branch  
Office of Strategic Environmental Analysis

Enclosure: Summary of Rating Definitions and Followup Action



**JIM DOYLE**  
GOVERNOR  
STATE OF WISCONSIN

October 16, 2003

Superintendent Bob Krumenaker  
Apostle Islands National Lakeshore  
Route 1, Box 4  
Bayfield, WI 54891

Dear Superintendent Krumenaker:

I am writing to support the proposed wilderness designation for the Apostle Island National Lakeshore and encourage the Park Service and Congress to name the wilderness after former Wisconsin Governor and US Senator Gaylord Nelson.

The state of Wisconsin was instrumental in the establishment of the Apostle Islands National Lakeshore decades ago when we donated our significant land ownership on Oak, Stockton, Basswood and Michigan Islands to the National Park Service. When we transferred these lands, we passed legislation declaring our intention that these lands be protected to "ensure that the citizens of this state will be assured the opportunity for wilderness, inspirational primitive and scenic experiences in the Apostle Islands into perpetuity." The National Park Service and US Congress can fulfill this covenant by approving the pending wilderness proposal.

The Apostle Islands are a treasure for the people of Wisconsin and the nation and a critical cornerstone for tourism in northern Wisconsin. The 22 islands, 150 miles of shorelines, 70,000 acres of pristine beaches, remnant old growth forests, sea caves and wildlife provide for lifelong memories for visitors. Because of these attractions, visitors to the islands have increased 40 percent over the past ten years and continue to rise.

In order to preserve these islands for future generations to enjoy, there is broad support for proposals to designate significant portions of the Apostle Islands as wilderness. This designation will maintain the islands as they are, protecting current uses of the park such as campsites, boating access, docks, and lighthouses while ensuring that the wilderness on the Islands will remain there for our children and grandchildren.

Former Governor and U.S. Senator Gaylord Nelson, the founder of Earth Day, had the vision and demonstrated leadership in protecting the Apostle Island for the enjoyment of future generations. In 1970 the Apostle Islands became the Apostle Islands National Lakeshore and part of the National Park Service. Therefore, as an expression of Wisconsin's gratitude for the conservation

Superintendent Bob Krumenaker  
Page 2

efforts and leadership of the founding father of the Apostle Islands, I strongly endorse naming the wilderness area after the honorable Gaylord Nelson.

Sincerely,



Jim Doyle  
Governor

CC: Congressman David Obey  
Senator Russell Feingold  
Senator Herb Kohl



WISCONSIN DEPARTMENT OF  
ADMINISTRATION

JIM DOYLE  
GOVERNOR  
MARC J. MAROTTA  
SECRETARY  
Division of Intergovernmental Relations  
101 East Wilson Street, 4<sup>th</sup> Floor  
Post Office Box 8944  
Madison, WI 53708-8944  
Voice (608) 266-0288  
Fax (608) 267-6917 TTY (608) 267-9629

Direct Telephone: (608) 266-3687  
E-mail: [travis.olson@doa.state.wi.us](mailto:travis.olson@doa.state.wi.us)

October 17, 2003

Jim Nepstad  
Management Assistant  
Apostle Islands National Lakeshore  
Route 1, Box 4  
Bayfield, WI 54814

RE: Wilderness Suitability Study at Apostle Islands National Lakeshore

Dear Mr. Nepstad:

Thank you for consulting with us regarding the Wilderness Suitability Study underway at Apostle Islands National Lakeshore on Wisconsin's Lake Superior coast.

The Wisconsin Coastal Management Program (WCMP) was established in 1978 under the Federal Coastal Zone Management Act to protect and wisely use this valuable natural resource for present and future generations. The WCMP has the responsibility to review federal activities that may affect the coastal resources of the State under the federal consistency review process (section 307, CZMA). Thus the WCMP welcomes the opportunity to review the final Environmental Impact Statement for the Wilderness Suitability Study for the Apostle Islands.

The Wisconsin Coastal Management Council, which advises the WCMP on the development and implementation of coastal policies, supports the designation of areas of the Apostle Islands National Lakeshore as protected wilderness under the 1964 Wilderness Act. WCMP staff will continue to monitor the development of a Final Wilderness Study, which may be subject to the federal consistency review process.

Let me know if you would like to further discuss these issues. Thank you for your attention.

Sincerely

Travis Olson, Analyst  
Wisconsin Coastal Management Program

cc. James Langdon, Division of Intergovernmental Relations  
Bill Smith, DNR  
Alberto Vargas, WCMP

[coastal.wisconsin.gov](http://coastal.wisconsin.gov)

RESPONSE/MEMORANDUM

State of Wisconsin

DATE: September 11, 2003

TO: Natural Resources Board Members

FROM: Scott Hassett - Secretary

SUBJECT: Apostle Islands National Lakeshore Resolution

**BACKGROUND.** The Apostle Islands National Lakeshore was authorized by Congress in 1970, and consists of 21 of the 22 Apostle Islands located off Wisconsin's Bayfield Peninsula, as well as a narrow strip of land on the Peninsula itself. In 1975 the state of Wisconsin deeded lands that it owned on several of the islands to the National Park Service, with the proviso that the cession be contingent on the lands being managed in an undeveloped state. In the act authorizing the transfer, the legislature declared that "it is the policy of the legislature that the Apostle Islands be managed in a manner that will preserve their unique primitive and wilderness character . . . (to) ensure that the citizens of this state will be assured the opportunity for wilderness, inspirational primitive and scenic experiences in the Apostle Islands into perpetuity."

Under the terms of the Wilderness Act the National Park Service was required to do a wilderness study of the Apostle Islands. The study was begun in 2001. In 2002 four wilderness/non-wilderness alternatives were developed and presented to the public in a series of public meetings. In July, 2003, the preferred alternative was published, and was presented to the public in another series of meetings. After analyzing the public comments, the Park Service will make its recommendations to Congress: only Congress can establish a unit of the National Wilderness Preservation system.

The Park Service preferred alternative would recommend permanent wilderness protection for most of the lands on 18 of the islands, totaling about 80% of the land acreage of the park. Lake Superior water areas would not be included in the wilderness, nor would the shoreline strip on the Bayfield Peninsula mainland. All major public use facilities — principally lighthouses and docks — are excluded. Long Island is excluded at the request of the Bad River Band of Chippewa; Sand Island is excluded because of scattered non-conforming structures and the desire to use the island for future historic and cultural interpretation; Basswood Island is excluded to provide for possible future non-wilderness development (e.g. a day use picnic area), and also possible historic and cultural interpretation.

Wilderness designation is an "overlay" on the park, forest, or refuge unit in which it is established. In general it prohibits motorized access, extractive commercial activity, and construction of buildings or other structures. Other activities, such as hunting, trapping, and fishing, continue to be governed by whatever laws and regulations applied to the property before the wilderness designation was established. Hunting, trapping, and fishing are permitted at the Apostle Islands and would not be affected by wilderness designation.

The National Park Service has managed nearly all of the lands on the Islands as wilderness since the creation of the Lakeshore. Since docks, developed campgrounds, and structures are excluded from the proposal, no existing use of the Lakeshore will be affected by the wilderness designation.



Public comments have generally been supportive of the wilderness designation, and no organized opposition has developed. Some boaters have questioned the proposal, as they would like to see additional docks created. Environmental groups have been generally supportive of the Park Service's proposal, but recommend the inclusion of Basswood Island in the proposed wilderness: they argue that the potential historic and cultural interpretation can be better accomplished on Sand Island (the exclusion of which they agree with,) and that Basswood's location close to the city of Bayfield makes it the most vulnerable island to inappropriate development pressures, and hence the most important to protect with wilderness designation. A "shared vision" alternative that would include Basswood Island has been developed. The NRB's proposed resolution does not favor either specific proposal over the other.

Gaylord A. Nelson was Governor of Wisconsin from 1959 to 1962, and US Senator from 1963 to 1980. As Governor he did much to establish the bi-partisan commitment to resource conservation and wise stewardship that has prevailed in Wisconsin for most of the years since then. As Senator he developed an international standing as a leader in conservation and environmental issues. Since leaving the Senate he has continued to be a tireless advocate for wilderness values as a spokesman for the Wilderness Society. Growing up in northwestern Wisconsin, Gaylord Nelson knew the Apostle Islands from his childhood on. Establishment of the Apostle Islands National Lakeshore was one of his two main goals when he first ran for the Senate, and he did not rest until it was accomplished. Naming of the wilderness is not a part of the National Park Service proposal but is permitted by National Park Service policies.

CC: Laurie Osterndorf - AD/5

## STATE OF WISCONSIN NATURAL RESOURCES BOARD RESOLUTION

**WHEREAS**, since its establishment in 1970 the Apostle Islands National Lakeshore has been an outstanding natural resource available to the people of the state of Wisconsin, and

**WHEREAS**, in 1975 the Wisconsin legislature declared that "it is the policy of the legislature that the Apostle Islands be managed in a manner that will preserve their unique primitive and wilderness character . . . (to) ensure that the citizens of this state will be assured the opportunity for wilderness, inspirational primitive and scenic experiences in the Apostle Islands into perpetuity," and

**WHEREAS**, the National Park Service has managed the great majority of the land within the National Lakeshore as wilderness, and has recently completed a study recommending that this management philosophy be made permanent by enacting statutory wilderness dedication for most of the Apostle Islands' land base, and

**WHEREAS**, former Wisconsin Governor and United States Senator Gaylord Nelson was directly responsible for the establishment of the Apostle Islands National Lakeshore, and has been for four decades one of the nation's leading advocates for protecting wilderness values throughout the United States, now therefore

**NOW, THEREFORE, BE IT RESOLVED**, that the Wisconsin Natural Resources Board recommends to the United States Congress that it pass legislation to enact wilderness status for the Apostle Islands National Lakeshore, excluding those lands currently managed for non-wilderness uses and one or more sites of historical and cultural significance where future interpretation would be significantly hindered by wilderness designation, and

**BE IT FURTHER RESOLVED**, that the Wisconsin Natural Resources Board recommends that the unit of the National Wilderness Preservation System created within the Apostle Islands National Lakeshore be named the Gaylord Nelson Wilderness.

Approved on this 24<sup>th</sup> day of September 2003 by the Natural Resources Board at its meeting in Boulder Junction, Wisconsin.

NATURAL RESOURCES BOARD

\_\_\_\_\_  
Trygve A. Solberg  
Chairman

## TOWN OF BAYFIELD

City, Trunk J • P.O. Box 1126  
Bayfield, WI 54814

October 14, 2003

Bob Krumenaker  
Superintendent, Apostle Islands National Lakeshore  
Rt, 1 Box 4  
Bayfield, Wis. 54814

Dear Superintendent Krumenaker:

On Monday, October 13, the Town of Bayfield held an information session on the proposed designation of the AINL to Wilderness. We thank you for your time and the information that you presented.

1.

The Town Board goes on record supporting the wilderness designation, alternate C on the condition the NPS can define water or access level to the Islands so access is available at all time regardless of the water level. The vote was three affirmative and two against.

Thank you again for your time.

Sincerely,

*Jane Hauser*  
Town of Bayfield  
Board of Supervisors  
Jane Hauser, Clerk

### Response to Town of Bayfield

1. The waters and submerged lands of Lake Superior up to the high-water mark were determined to not be suitable for wilderness. This exclusion covered all existing beaches and public docks on the islands. If lake levels were to change, either raising or dropping, the high-water mark would change, as would the wilderness boundary, which would always be above the lake. Regardless of the water level, beaches and public docks would continue to be outside the wilderness boundary, ensuring access to the islands. See also the new text box on the wilderness boundary and Lake Superior in the "Alternatives" chapter in this document.

Town of Russell  
35900 State Highway 13  
Bayfield, Wisconsin 54814  
(715) 779-5338 or Fax (715) 779-0249  
townofrussell@centurytel.net

Paul Tribovich  
Chair

Dave Good  
Clerk/Treasurer

September 15, 2003

Robert Krumenaker, Superintendent  
Apostle Islands National Lakeshore  
Attn: Wilderness Study  
Route 1 Box 4  
Bayfield, WI 54814

Dear Superintendent Krumenaker:

RE: OPPOSED TO WILDERNESS DESIGNATION

The Town of Russell Board of Supervisors is opposed to designating the majority of the Islands in the National Park as wilderness. This action was taken following our discussion at a Regular Monthly Board Meeting on September 9, 2003.

The Board has taken this position in opposition to the wilderness classification for the following reasons:

1.

1. The islands are not untouched by man and in a primitive state warranting "wilderness" designation. Most islands have extensive man made impacts such as quarries, logging roads, old railroad grades, logging camps, no first growth forests, and other significant human impacts.
2. The current method of managing the park without the "wilderness" designation is working just fine. The resource is being protected and preserved.
3. Access to the islands is almost entirely by motorized vehicle (boat, ATV, snowmobile). Traveling to the island via these conveyances creates noise and doesn't fit with the concept of "wilderness". People have a concept that "wilderness" is supposed to take you away from these mechanized machines. Why mislead them in thinking they are in a "wilderness" when boats, planes, snowmobiles, etc. can cruise the shorelines and Lake Superior without restriction.
4. Most islands have some structures on them. These can range from lighthouses, docks, NPS structures and developments such as campgrounds. The idea that you can carve these areas out of the "wilderness" designation and several hundred feet away it is a "wilderness" is a rather stupid concept.
5. The ability to offer the public a "wilderness" experience is important. We do not believe this small park, dispersed within Lake Superior which is a means of public

transportation for commercial cargo and sight seeing vessels and commercial fishing realistically affords a "wilderness" experience to a visitor.

2.

6. Any where a person would go within the islands, they will hear planes and boat motors. Visually they will see sail boats, lighthouses, fishing vessels, fishing boats, charter boats, etc. Does this make sense in a "wilderness"?

These are just a few of the reasons we think the park should NOT BE DESIGNATED A WILDERNESS and management of the resource should continue as it has since the park was established.

Sincerely:



Paul "Rocky" Tribovich, Chairman  
TOWN OF RUSSELL BOARD OF SUPERVISORS

cc: Governor Jim Doyle

## Response to Town of Russell

1. As noted on p.10, an area does not need to be untouched by people to be considered for wilderness designation. See also response 3 to Citizens Against Apostle Islands Wilderness and response 1 to the Isaak Walton league.
2. It is not true that anywhere one goes within the islands one would hear planes and boat motors: in the interiors of many of the islands, motor sounds would rarely be heard. While it is true that on the shoreline of the islands one would more likely hear motor sounds and see boats, this is true on the boundary of many wilderness areas, where people arrive by vehicles. It also should be noted that NPS wilderness guidelines state that external influences are not to be considered in evaluating wilderness suitability: "The term "wilderness character" applies only to the immediate land involved, not to influences upon it from outside areas." See also the above responses.



ASHLAND-BAYFIELD COUNTY  
**THE LEAGUE  
OF WOMEN VOTERS**  
ASHLAND, WISCONSIN 54806

10/7/03

Bob Krumenaker  
Superintendent  
Apostle Islands National Lakeshore  
Rt. 1 Box 4  
Bayfield, WI 54814

Dear Superintendent Krumenaker,

The Ashland/Bayfield County League of Women Voters writes to voice support for the "Preferred Alternative Plan" being submitted as part of the application for Wilderness designation. This support comes as a consensus vote of the membership. Our local LWVs represents approximately 100 Wisconsin Citizens living near to the Apostle Islands.

We based our decision after review of Position Statements from the LWVUS and application of these standards to the proposed alternatives. The "Preferred Alternative Plan" is the best fit with the LWV Positions. The Positions have been reached in a well-honored tradition in which the League members study issues and then after due deliberation, reach consensus. The Positions Statements therefore represent the opinions of thousand of United States citizens.

Specifically, The LWVUS Position on Natural Resources states:

"The League of Women Voters of the United States believes that natural resources should be managed as interrelated parts of life-supporting ecosystems. Resources should be conserved and protected to assure their future availability...

To assure the future availability of essential resources, government policies must promote stewardship of natural resources....

The League supports comprehensive long-range planning and believes that wise decision making requires...

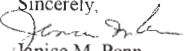
-special responsibility by each level of government for those lands and resources entrusted to them;...

-special consideration for the protection of areas of critical environmental concern, natural hazard, historical importance and aesthetic value."

The ABC/LWV believes the Apostle Island National Lakeshore is a unique historical and aesthetic ecosystem. As such it deserves to be maintained in large part as wilderness, as described in the Preferred Alternative Plan.

Thank you for considering our comments in this matter.

Sincerely,

  
Janice M. Penn  
President-ABC/LWV  
Rt. 1 Box 267  
Highbridge, WI 54846





"Always In Season"

P.O. Box 138  
42 South Broad Street  
Bayfield, Wisconsin 54814  
715-779-3335  
fax: 715-779-5080  
1-800-447-4094  
www.bayfield.org

September 22, 2003

Bob Krumenaker, Superintendent  
Apostle Islands National Lakeshore  
Rt. 1, Box 4  
Bayfield WI 54814

Dear Superintendent Krumenaker:

The Bayfield Chamber of Commerce is pleased to inform you that a resolution was passed at the Board of Director's October meeting endorsing the designation of the Apostle Islands as wilderness as outlined in Alternative C of the Draft Wilderness Study and Environmental Impact Statement..

Specifically, the following resolution was unanimously passed:

"RESOLVED THAT the Board of Directors of the Bayfield Chamber of Commerce recognizes the importance of the Apostle Islands National Lakeshore to the residents, visitors, and future generations of the Bayfield area for its natural beauty, environmental value, recreational value, historical importance, and tourism-related economic impact on the area.

"To ensure that the integrity of the Apostle Islands National Lakeshore is protected for generations to come, the Bayfield Chamber of Commerce Board of Directors goes on record in support of the National Park Service recommendation of implementing Alternative C of the Draft Wilderness Study and Environmental Impact Statement, which proposes designating approximately 80% of the Apostle Islands National Lakeshore as protected wilderness. The Chamber Board also encourages the Park Service to give due consideration to the "Shared Vision" proposal from the Friends of the Apostle Islands National Lakeshore before making its final recommendation to Congress."

Sincerely,

Tom Fabjance, President

Al Chechik, Vice President

Eric Carlson, Secretary

Jack Began, Treasurer

Nancy Bussey

Mary Grant

John Thiel

Jim Hauser

Kathleen Russell

Cc: Senators David Obey and Russell Feingold

CHEQUAMEGON DEMOCRATIC PARTY  
(Ashland and Bayfield Counties, WI)  
c/o James A. Collins, Chair  
22935 Missionary Point Drive  
Cable, WI 54821

August 27, 2003

Mr. John Neal, Superintendent  
Apostle Islands National Lakeshore  
Route 1, Box 4  
Bayfield, WI 54814

Re: Wilderness Designation for Apostle Islands National  
Lakeshore

Dear Mr. Neal:

The Chequamegon Democratic Party (Ashland/Bayfield Counties, WI) supports permanent wilderness status for the Apostle Islands National Lakeshore. At our July 24, 2003 meeting, we passed a resolution supporting the permanent wilderness designation (Preferred Alternative C in the Park Service Wilderness Study). We are a 120 member organization whose members and families enjoy the wilderness and wish to preserve and protect it for current and future generations.

Very truly yours,

James A. Collins  
James A. Collins, Chair  
Chequamegon Democratic Party

Jac/deg



October 14, 2003

Apostle Islands National Lakeshore  
Wilderness Study Coordinator  
National Park Service  
Route 1, Box 4  
Bayfield, WI 54814

Dear Wilderness Study Coordinator Nepstad,

The Chequamegon Audubon Society is the chapter of the National Audubon Society located in the part of Northwestern Wisconsin that includes Apostle Islands National Lakeshore. We have a membership of about 100 individuals who are supporters of wilderness and the national parks. We appreciate the opportunity to comment on Apostle Islands National Lakeshore's Draft Wilderness Study. We strongly support the designation of a wilderness area within the park's boundaries, and are pleased that the National Park Service supports the idea of permanent protection for this unique national park's rich array of natural and cultural resources. Although most of the islands are already managed as a wilderness area under the park's General Management Plan, a formal wilderness designation would offer permanent, legal protection, and would preserve its wilderness character for generations to come.

The park's preferred alternative (alternative C) for wilderness designation would extend wilderness protection to about 80% of the land area of the park. Chequamegon Audubon supports this proposal, but would also support proposals that would include designating most of Basswood Island as wilderness. Excluding the dock area and the area around the historic brownstone quarries from wilderness designation would provide opportunities to interpret the island's cultural resources for visitors, but would protect the wilderness character of the rest of the island.

Opportunities to offer wilderness protection to our public lands are becoming increasingly rare, and we commend the park's staff for their work in support of wilderness designation in the national lakeshore. We also support Wisconsin Gov. Jim Doyle's proposal to name the wilderness the "Gaylord Nelson Apostle Islands

Wilderness Area" in honor of the man most responsible for protecting this remarkable corner of the state.

Thanks you for this opportunity to comment.

Sincerely,

*Leon Solberg* *Sam Atkins*  
*Cory MacNulty* *Nail Hawk*  
Chequamegon Audubon Society Board of Directors

Leon Solberg  
Sam Atkins  
Cory MacNulty  
Nail Hawk

**Citizens Against Apostle Islands Wilderness**  
**PO Box 206**  
**Ashland, WI 54806**

The National Park Service is intent on its mission to convert the Apostle Islands National Lakeshore into a wilderness area. I would like to go on record, not only for myself but hundreds of others, in opposing this plan. The reasons are numerous and varied and will be addressed as completely as possible.

But first a comment expressed in a Duluth Tribune article by Bob Krumenaker, Apostle Islands superintendent, must be examined. He stated that, and I quote, "So far, no organized opposition has mounted." That is true, but only because the backers of this proposal are well funded special interest groups, whereas the public does not have a group or professional organization through which to voice their concerns. Please be advised that those of us in opposition, are in the process of trying to get organized.

Back in 1970 when the Lakeshore was established, one of the selling points the special interest groups and the Park Service used to convince many people, was the fact that according to Title 16, Sec. 460w, one of the prime functions of the NPS was to develop the islands for the recreational use of the public. To that end, the federal government has invested millions of dollars in local facilities, such as the Ashland Marina, to encourage the use of the islands. Now, the NPS wants to change the mission.

It must also be pointed out, that in the original plans, Long Island was not included in the park because of its location. Because of a bird, the government decided it must manage that island also, against the promises made only a few years prior. Now the NPS wants to change its major objective.

In addition, we the taxpayers of Bayfield and Ashland counties have had to assume an additional financial burden, because of the removal of thousands of acres from our tax rolls. Monies we are still paying.

The fear of creating a wilderness area in the Apostle Islands has many foundations.

1.
  1. Take for instance the errors that were made at the Isle Royale National Park. After making the same promises that are being made about the Apostle Islands, the NPS decided to remove many of the docks and alter trail access. In a court case challenging this effort, Circuit Judge Karen Nelson Moore, opined that it is within the discretion granted by the Wilderness Act and the National Park Service's Organic Act that the NPS could do as it wishes. Now we are being asked to believe the same promises as were put forth at Isle Royale.

## Responses to Citizens Against Apostle Islands Wilderness

1. The situation with Isle Royale National Park docks and Apostle Islands National Lakeshore docks is different, and the two cannot be compared in this manner. Wilderness was designated at Isle Royale in 1976, with very few land areas excluded from the wilderness designation. Many of the docks at Isle Royale are immediately adjacent to wilderness; one steps directly from these docks into wilderness. The close proximity of docks to wilderness, and the fact that some of these same sites are also major backpacking trailheads and canoe portages, has contributed to conflict among various Isle Royale users. This conflict is one of the major reasons that the recent *General Management Plan* for Isle Royale proposes to remove docks from some locations at Isle Royale and place them elsewhere in the national park. (That plan would actually result in a net increase in docks within Isle Royale National Park.) In all of the Apostle Islands wilderness alternatives, the land adjoining each public dock is purposely kept out of wilderness. In further contrast to Isle Royale, none of the Apostle Islands docks serve as major congregating points for backpackers, canoeists, or even kayakers. We believe that the different geography and the deliberate decisions on wilderness boundaries will minimize or avoid entirely the kind and magnitude of user conflicts that led to the dock relocation proposals at Isle Royale. By carefully listening to the concerns expressed by Isle Royale boaters, we believe we have incorporated safeguards into all of the wilderness alternatives to prevent the need for similar actions in the Apostle Islands. Thus, no public docks in Apostle Islands National Lakeshore would be removed as a direct or indirect result of wilderness designation.

2. 2. It should be noted the NPS has already removed or plan to remove a series of docks, i.e., Bear Island, Bass Island and South Twin. It is also planning to remove picnic tables.
3. No matter what propaganda is being presented, there are rules governing how the NPS shall conduct its operations under the Wilderness Act. The Wilderness Act specifically prohibits certain uses and developments, such as motorized equipment (another way of saying boats with motors) picnic tables, interpretive signs and trails and waysides, and other forms of mechanical transport (e.g. bicycles). Mr. Krumenaker and others can say publicly that no drastic changes will be made, but that is pure hogwash. They are governed by existing laws.
4. There are hundreds of laws, regulations and court decisions that protect the public's lands and resources, whether or not they are designated as wilderness or not. So, when you hear someone claim that an area must be designated legal wilderness to protect it from destruction, understand that they are either ignorant or they are attempting to deceive you.
5. The Apostle Islands, even without the NPS have the finest protector of their future, of any park. That protector is Mother Nature and the waters of Lake Superior. Combine the bugs, mosquitoes, wildness, and the possible violent nature of Lake Superior and you have a triple threat against too much use.
3. 6. The NPS has taken a very loose definition of land suitable for wilderness under Management Policies 2001. One criteria is that the earth and its community of life are untrammelled by man. Don't the quarries on Bass and Stockton, the railroad track on Outer, the various docks and cottages that were located in the islands, the logging that went on, the construction of Lighthouses, and etc. qualify as trammelled? Another criteria is the area has outstanding opportunities for solitude or a primitive and unconfined type of recreation. It doesn't take an Einstein to figure out that boaters are not primitive.
7. The NPS has already made a number of mistakes in the Apostle Islands. The construction of a non-usable dock on Michigan Island, and the razing of the Nourse's fish camp and fish boil facility on Rocky Island only to replace it with a structure that is modern and intrusive are examples.

2. No public docks are planned for removal from the islands you cited. An unusable, unsafe dock was removed from South Twin Island for safety reasons in 2003. The dock at the north end of Basswood Island was taken out by a storm and not replaced many years ago. No public docks have ever existed or been removed from Bear Island. Picnic tables would only be removed from a small number of campsites if wilderness is designated in the park.
3. The criterion you cited is not the only criterion used to determine if an area is suitable for wilderness. As noted on p. 10, another criterion is that the area "...generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable." NPS Management Policies 2001 also state that "Lands that have been logged, farmed, grazed, mined... may also be considered suitable for wilderness designation if, at the time of assessment, the effects of these activities are substantially unnoticeable or their wilderness character could be maintained or restored through appropriate management actions." Many existing designated wilderness areas, such as in Shenandoah National Park, were substantially altered by people but subsequently recovered to a more "natural" condition and were designated as wilderness. In both the Wilderness Act and the Eastern Wilderness Act, Congress recognized that areas that had been altered by people could still be considered for wilderness designation. In addition, you should be aware that many of the developments you mentioned (i.e., the light stations, docks, quarries on Basswood and Stockton Islands) are not being proposed for wilderness designation. And boaters on the water are also outside the areas being proposed for wilderness designation. See also response 1 to the Izaak Walton League.

4. 8. The National Park Service has issued user figures, citing 200,000 visit the park each year; 75,000 get to the islands by boat, with 29,000 of those 75,000 using the tour boats. That leaves 46,000 visiting the islands by private boats. Baloney! How that 46,000 figure is reached is that every island with a ranger counts every boat that goes by the island as not only visiting the island, but containing four people. When I took a fishing trip to the West side of Sand Island with only two people on board, I went by four islands with rangers. Hence, since I also went by four islands with rangers on the way back, I was counted as 32 people who visited the islands. Yet, I never stopped at an island. I wonder how the count escalates when a sailboat race goes through the islands. If an agency is going to release figures, they should be accurate.

5. 9. Ashland and Bayfield counties are economically depressed, with little industry and jobs scarce. The major industry is tourism and any effort that may impede the development or continuation of tourism should be regarded as highly suspect. Designating the Islands as a wilderness leaves open the possibility that the enactment of the Wilderness Act could curtail or ruin this industry. Why take the chance?

I would like to quote Congressman Chris Cannon of Utah, "The tradeoffs that accompany wilderness designation can hurt other resource values. Legal wilderness is simply a land management scheme to promote a certain recreational preference. Choosing this option entails tradeoffs, some of which promote certain resource values at the expense of other resource values. The only way to say that legal wilderness is "better" than other land management options is to first decide that the resource values which are thereby promoted are "better" than the values which are damaged by legal wilderness. The REAL ISSUE in the debate over legal wilderness designation is choosing which resource values to promote over others."

In summing up our opposition to the wilderness designation, I would like to quote Superintendent Krumenaker, when asked what the islands would be like 50 years from now if the wilderness designation doesn't go through. He replied, "There probably wouldn't be any change, except that maybe the boaters would force us to build a facility such as that on Stockton Island." In other words, the islands are to be for a select group, not for everybody.

There is an old quotation that says, "If it ain't broke, don't fix it." The islands are not broken, so let's not make any changes that our children may deeply regret.

Dave Sorenson

4. In fact, the text on p.60 stated slightly different figures for 2001 than the numbers you cited. A total of 48,000 visitors were estimated to access the islands via private boats. This number was primarily based on the number of boats anchored off the islands at night or the number of visitors encountered by NPS employees on the islands. Boats passing islands are not counted in the park's visitor figures.

5. We do not believe there is any evidence to indicate that wilderness designation would adversely affect the local tourism industry, as noted in the text on pages 19-20. Indeed, the City of Bayfield and the Bayfield Chamber of Commerce passed resolutions in support of wilderness in the Apostle Islands.

Dave Searles  
Founder and President

**THE ECOTOPIAN SOCIETY**

607 E. 2nd Avenue  
Brodhead, WI 53520-1114

608-897-2368  
ecotopian@wekz.net

The Ecotopian Society is an environmental and progressive philosophical and political network. It is dedicated to preserving and protecting the environment and our national heritage. Ecotopian political philosophy is a combination of Environmentalism, Jeffersonianism and Progressivism. Ecotopians were Democrats but first the Democratic National Committee sold out to the rich, big business and corporate America and then some of our most trusted elected Democratic leadership abandoned us. We now strive to create and build a new political party, the Ecotopian Party, that will truly protect the environment and represent the people.

**Protect the Apostle Islands**

I am fully behind the National Park Service's efforts to permanently protect parts of the Apostle Islands National Lakeshore from any future development by designating them Wilderness Areas while maintaining historic and cultural aspects on them.

The Apostle Islands is home to one of the greatest concentrations of black bears in North America and geologic wonders including carved arches, intricate sea caves, and dramatic red sandstone bluffs. The primitive character of these islands must be preserved to protect this unique habitat and for the enjoyment of future generations.

The Wisconsin state legislature entrusted these islands to the Park Service on the condition that their wilderness character be preserved. The Park Service has an obligation to protect the maximum number of acres as Wilderness Areas. It has already had a great start - I understand that much of this area has been managed as wilderness since 1989, following a study which concluded over 97% of the lands in the Apostle Islands are suitable for wilderness designation.

Therefore, I call on you to designate the maximum amount of land possible as wilderness areas while keeping in mind that making them wilderness areas does not mean we must remove all traces of past human activity.

Thank you for taking the time to read and to consider this matter.

Sincerely,

Dave Searles

M.A., History, Washington College, MD, 1992  
B.A., Milton College, WI, History-Political Science major and minors in Criminal Justice and Natural Resources





October 13, 2003

Wilderness Study Coordinator  
Apostle Islands National Lakeshore  
Route 1, Box 4  
Bayfield, Wisconsin 54814

Dear Wilderness Study Coordinator:

On behalf of the Board of Directors and staff of the Friends of the Boundary Waters Wilderness ("Friends"), please accept the following comments regarding the Draft Wilderness Study/Environmental Impact Statement for the Apostle Islands National Lakeshore. We appreciate the opportunity to share our concerns, comments and recommendations with you. Please make our comments part of the official record.

The Friends is a non-profit wilderness conservation organization with about 3,000 members from across the country. The mission of the Friends of the Boundary Waters Wilderness is *to protect, preserve and restore the wilderness character of the Boundary Waters Canoe Area Wilderness (BWCAN) and the Quetico-Superior Ecosystem.*

Staff members visited the Apostle Islands National Lakeshore for two days in July 2003 and attended open houses hosted by the National Park Service (NPS). We appreciate the time and effort taken by NPS staff members to present information and answer our questions.

Many Friends members and residents from Minnesota and throughout the upper Midwest visit the Apostle Islands National Lakeshore. Protecting the Apostle Islands is important to achieving a region of wild interconnected areas across northern Minnesota, Wisconsin and Michigan. Such efforts are important to the long-term health and protection of the Boundary Waters Canoe Area Wilderness.

## I. EXECUTIVE SUMMARY

The Friends endorses a modified Alternative C, which designates most islands in the park as wilderness. Our proposed change is to designate Basswood Island as wilderness, with the exception of the dock on the west side of the island and a quarry on the southern tip of the island. These exclusions are consistent with a myriad of other areas throughout the park that historically have not been managed as wilderness, including, but not limited to, waterways, all public docks on the islands, and major cultural sites such as the six light stations and numerous historic residences and structures.

The Friends of the Boundary Waters Wilderness also offers the following comments and recommendations:

- A. The Friends strongly opposes the addition of "limited facilities" and "additional visitor developments" relating to the cultural resources on Basswood, Sand, Rocky, and Stockton Islands, as noted in Alternative C.
- B. The Friends urges the National Park Service to make its final decision regarding wilderness designation based on the Apostle Islands National Lakeshore's suitability for wilderness – not based on the NPS's plans for future development.
- C. Discussion regarding future development should be part of the Park's management plan – not part of the draft wilderness study. We would like to see a detailed explanation, in the Park's management plan, why the National Park Service believes that additional facilities might be needed given the extensive current system of visitor facilities.
- D. The National Park Service must ensure that the biologically-important sand bridge, or tombolo, that now connects Presque Isle to Stockton Island is protected given that *"sandscape vegetation is ... very sensitive to human trampling."*
- E. The National Park Service must address ways in which it will protect the bear population from the encroachment of humans on both Stockton and Sand Islands.
- F. The National Park Service must ensure the continuing protection of piping plovers' habitat. We request that the final Wilderness Study include a discussion of how the Park Service will comply with its legal responsibility to not adversely modify or destroy critical habitat when Long Island changes from *de facto* wilderness to non-wilderness.

## II. OVERVIEW

The Apostle Islands National Lakeshore lies at the northern tip of Wisconsin as it juts into Lake Superior. The 21 islands (Madeline Island is the only island not included in the National Lakeshore) range in size from three acres (Gull Island) to 10,054 acres (Stockton Island), and each of them is unique. There are old-growth forests; high hills and steep valleys; red sandstone bluffs and intricate sea caves; and one of the greatest concentrations of black bears in North America.

While the surrounding waterways (not slated to be designated as wilderness) provide recreational opportunities for a variety of boats (kayaks, motorboats, and sailboats), the interiors of most of the islands remain remote and primitive and their characteristics are consistent with the tenets of the Wilderness Act: *"... an area where the earth and its community are untrammelled by man, where man himself is a visitor who does not remain..."* [16 U.S.C. § 1131 (c)].

### III. COMMENTS ON PREFERRED ALTERNATIVE C

1.

#### A. Inclusion of Basswood Island as Wilderness

The Friends endorses a modified Alternative C, which designates most islands in the park as wilderness. **The Friends urges the National Park Service to designate the 1,917 acre Basswood Island as wilderness, with the exception of the public dock and the quarry at the southern tip of the island.** These exclusions are consistent with a myriad of other areas throughout the park that historically have not been managed as wilderness, including, but not limited to, waterways, all public docks on the islands, and major cultural sites such as the six light stations and numerous historic residences and structures.

Friends staff spent four hours walking along Basswood's shoreline and interior, and strongly believes that this heavily-forested island deserves wilderness protection. The island's shoreline and interior were remote, quiet, wild, and exhibited "... *outstanding opportunities for solitude or a primitive and unconfined type of recreation.*" [National Park Service's Wilderness Preservation and Management Policies, 6.2.1.1.].

Aside from a few small clearings, as a result of early farming, the dense forest of red oak, sugar maple, quaking aspen, white and yellow birch, eastern hemlock, balsam fir, white cedar, red and white pine, and a few basswood trees provides a true wilderness experience. Red squirrels are common; there are whitetailed deer; and the island's diverse habitat attracts many of the 100 plus bird species that nest in the Apostles, including bald eagles. [www.nps.gov/apis/htm]

While there is evidence, to the trained eye, of the McCloud-Brigham Farm and the Rudd Farm, an old logging camp, and two quarries on the island, these sites are not incompatible with wilderness. According to the National Park Service's Wilderness Preservation and Management Policies: "*Lands that have been logged, farmed, grazed, mined, or otherwise utilized in ways not involving extensive development or alteration of the landscape may also be considered suitable for wilderness designation if, at the time of assessment, the effects of these activities are substantially unnoticeable or their wilderness character could be maintained or restored through appropriate management actions.*" [National Park Service's Wilderness Preservation and Management Policies, 6.2.1.2.].

For example, the McCloud-Brigham Farm, founded in 1865 and farmed until 1923, was the first homestead in the Apostle Islands. Today, there are remains of old buildings and stone walls that have all but been obliterated by the forces of nature. The remnants of this farm, along with the logging camp and quarries, enhance the visitor experience as they speak eloquently to a rich human history *and* the resilient power of nature. And, it is just that power Congress sought to preserve when it passed the Wilderness Act of 1964. It should be noted that Congress occasionally has included historic evidence within wilderness designations. While not common, old mining shacks and herders' shelters can be found in several wilderness areas in the western United States.

#### Responses to Friends of the Boundary Waters Wilderness

1. While we agree that Basswood Island is suitable for wilderness designation, we believe there are other justifiable reasons for not including the island in the NPS wilderness proposal. See response 1 to the National Parks Conservation Association and response 2 to PEER.



2.

### B. Opposition to Future Development

**The Friends strongly opposes the addition of “limited facilities” and “additional visitor developments” relating to the cultural resources on Basswood, Sand, Rocky, Stockton Islands as noted in Alternative C.** The draft study states that “*they [Basswood and Sand] are ideally suited for the expansion of interpretive opportunities, such as some limited facilities to help visitors understand the historical and natural processes on the Apostle Islands.*” [Draft, page 33]. Furthermore, the study states that the former fishing community on Rocky Island “*... keeps open the possibility of providing additional visitor developments to accommodate increased use in one of the park’s most popular areas.*” [Draft, page 34]. And finally, the study states that on Stockton Island, the new boundary would “*... keep open the possibility of providing additional visitor developments to accommodate increased use in the immediate vicinity of these popular areas.*” [Draft, page 34].

Interpretive opportunities and increased visitor use are not compelling reasons for additional facilities or developments. As outlined below (see V), the Friends believes there are others ways in which to interpret the rich cultural history of the islands other than building structures and erecting signage.

Furthermore, the Friends strongly discounts the argument that a possible increase of visitors to the Apostle Islands warrants additional visitor developments. The Apostle Islands National Lakeshore currently provides the following to its 195,000 annual visitors: a visitor center in the old courthouse building in Bayfield; a visitor center at Little Sand Bay; a visitor center on Stockton Island; six light stations, all of which are major visitor attractions; and the Manitou Island Fish Camp.

3.

### C. Concerns on Decision-Making Process

**The Friends urges the National Park Service to make its final decision regarding wilderness designation based on the Apostle Islands National Lakeshore’s suitability for wilderness – not based on the NPS’s plans for future development.** Specifically, we are concerned that in Alternative C, “some areas were excluded because of the potential for expanding visitor facilities.” [Draft, page 33]. Determining an area’s suitability for wilderness designation should not be based on the need for more development

2. Comment noted. We disagree that interpretive opportunities and increased visitor use are not valid reasons for additional developments. While we agree that there are other interpretive techniques than building signs and structures to interpret cultural history, interpretive trails with signs and on-site structures like waysides communicate information in different ways than brochures and distant signs, and may be more effective in communicating with visitors, depending on the situation. Additional facilities, such as restrooms and visitor contact stations, may be warranted to meet the needs of increasing numbers of visitors and/or to help avoid or mitigate impacts to resources. Changes in user populations also may require new developments. This is not to say that we would (or could) provide new facilities in all of these situations. But we believe it is important to retain the flexibility, with appropriate public input and environmental compliance, to provide such facilities on a small number of the islands in the future. See also responses 1, 2, and 4 to PEER, response 2 to the National Parks Conservation Association, and responses 1, 4, and 7 to Brandt Mannchen.

3. Our decision in selecting alternative C as the preferred alternative was not based on plans for future development. No such plans exist. We selected alternative C as our wilderness proposal, as noted on p.33, because we believe it provides excellent protection for the park's natural, cultural, and wilderness resources, it retains flexibility to provide outstanding interpretive opportunities for visitors, and it minimizes the number of small, fragmented areas of wilderness or nonwilderness. See also response 2 to PEER.

4.

#### IV. COMMENTS ON FUTURE DEVELOPMENT IN GENERAL

We are alarmed by the numerous references throughout the Draft Study that refer to future developments at a time when *"lack of adequate funding for preventative maintenance and investment projects has accelerated the deterioration of aging park assets and historic structures, and multiplied the cost of maintaining these facilities"* [Apostle Islands National Lakeshore Business Plan, page 10]. In fact, according to the Apostle Islands National Lakeshore Business Plan, the park operated in 2001 with an *"...almost \$3.5 million operational shortfall."* [Apostle Islands National Lakeshore Business Plan, page 3].

**Discussion regarding future development should be part of the Park's management plan – not part of the draft wilderness study. We would like to see a detailed explanation, in the Park's management plan, why the National Park Service believes that additional facilities might be needed given the extensive current system of visitor facilities. We specifically question this need because "as of September 30, 2001, 85% of park visitors surveyed indicated satisfaction with appropriate park facilities, services and recreational opportunities."** [Apostle Islands National Lakeshore Business Plan, page 12].

5.

#### V. COMMENTS ON CULTURAL RESOURCES AND INTERPRETATION

The Friends acknowledges that there is visitor interest in the history and cultural importance of the major cultural sites, such as Manitou Fish Camp and the six light stations. **The Friends urges the National Park Service to consider a myriad of other ways in which to disseminate information on these cultural resources other than future development.** For example:

- 1) Create "discovery site" pamphlets that would provide background information on these areas and allow visitors to "discover" the sites on their own rather than via interpretive signs, markers, or new structures.
- 2) Encourage Eastern National, a nonprofit that supports the park's visitor services and research programs, to publish additional books, maps and other publications focused specifically on the cultural resources
- 3) Maximize the use of employees and volunteers stationed at the light stations and Manitou Fish Camp and educate them about other cultural resources within the park so that as they talk about their specific site, they can also share information about the numerous other cultural sites around the islands
- 4) Use the existing three visitor centers and light stations and develop additional displays and videos that focus on the cultural resources.

Again, the Friends believes that the historical significance of past human activity on these islands should not be overlooked as it provides a rare opportunity to examine the interaction between humans and nature. Humans have been on the Apostle Islands for hundreds of years, and today, the islands show many signs of human activity. Since the mid 1600s, fur trading, quarrying, farming, logging, and fishing have occurred. Today, there are reminders of these activities such as at the Manitou Fish Camp and quarry pits on Stockton, Hermit, and Basswood Islands.

The Apostles are a unique blend of cultural history and natural forces, and these values are worth protecting. The last "improvement" they need is additional man-made facilities.

4. We agree that the question of whether or not future development is needed in the park should be addressed in the future general management plan. The only reason developments are discussed in this wilderness study is to examine potential impacts of designating or not designating wilderness. See also responses 1, 2, and 4 to PEER, and response 1 to Brandt Mannchen.

5. See response 2 above and response 1 to Brandt Mannchen.

## V. COMMENTS ON NATURAL RESOURCES

The Apostle Islands are a product of more than one million years of the *forces of nature*. Wind, waves and ice have carved distinctive arches, extensive sea caves, and honeycomb cliffs into the shorelines of these islands. There are miles of sandscapes, including beaches, sand spits, cusped forelands, tombolos and a barrier spit (Long Island, southwest of Madeline, is an example of a barrier spit). These unique sandscapes are constantly changing due to a variety of natural forces, and each of them supports a variety of ecologically-important plants and animals. .

In addition, several of the islands boast old-growth forests, towering reminders of what was once found across all of northern Wisconsin. For example, on Sand and Outer Islands, large white pine and hemlock dominate the reserve areas.

Finally, the forces of nature have created remarkable conditions that allow plants and wildlife to survive and thrive. For example, Stockton Island boasts one of the greatest concentrations of black bears in North America, and they regularly inhabit Sand and Oak Islands as well.

In addition, there are more than 100 species of birds (including the bald eagle), 800 species of plants (one federally listed and 37 listed as rare in Wisconsin, and over 200 species of mushrooms on Raspberry Island alone), and 35 different mammals. By establishing the Islands as a wilderness area, we are able to protect and restore the ecological health of these islands for the benefit of both its natural and human communities.

We do have some comments and concerns regarding natural resources in the non-wilderness areas in Alternative C.

### 6. a. Concern and Question regarding the tombolo on Stockton Island

While we concur with the reduction of non-wilderness lands on Stockton identified in Alternative C and excluding Presque Isle from wilderness designation given the large number of administrative and housing units in the area, we are concerned about the ongoing protection of the biologically-important sand bridge, or tombolo, that now connects Presque Isle to Stockton Island. Throughout the Draft Wilderness Study, there are repeated statements regarding potential development on the non-wilderness portions of the islands and specific to Stockton, comments such as “... *keep[ing] open the possibility of providing additional visitor developments to accommodate increased recreational use in the immediate vicinity of these popular areas.*” [Draft, page 34].

Sandscapes are vulnerable to invasions of exotic species, especially where native vegetation has been affected by human disturbance [Draft, page 53]. This would be exacerbated if the National Park Service builds additional facilities on Presque Isle. In addition, sandscapes are sensitive to disturbances such as fire and storms as well as repeated human traffic that can cause the sandcape to revert to barren sand [<http://www.nps.gov/apis/sandscap.htm>]. **The National Park Service must ensure that this unique, biologically-important sandcape is not destroyed given that “sandcape vegetation is ... very sensitive to human trampling.”** [Draft, page 53].

6. We agree that the tombolo on Stockton Island needs to be protected. As noted above, although the study generally evaluated the impacts of potential developments to fulfill the requirements of the National Environmental Policy Act, no new visitor developments are actually being considered or proposed on any of the islands. Protection of the park's sandcape features, like the Stockton Island tombolo, and the need for new developments are more appropriately addressed in future management plans, such as the general management plan.

7. **b. Concern for and comment on black bears on Stockton and Sand islands**

Stockton Island boasts one of the greatest concentrations of black bears in North America, and "*Stockton and Sand are the only islands with a known reproducing black bear population*" [Draft, page 54]. While we concur with the reduction of non-wilderness lands on Stockton and the exclusion of Sand Island from wilderness, we are concerned about the potential increased human activity on both of these islands caused by possible new developments. **The National Park Service must address ways in which it will protect the bear population from the encroachment of humans.**

8. **c. Concern for and comment on birds**

The Apostle Islands boast more than 100 species of birds, and the islands serve as an important migratory flyway stopover in the Great Lakes region [Draft, page 54]. "*Because the Midwestern landscape has been drastically altered since European settlement, maintaining the quality of remaining stopover sites is critical if birds are to reach their breeding or wintering grounds in good physiological condition... Larger, more ecologically diverse tracts of land with natural mosaics of forests, wetlands, grasslands and openings, are likely to be consistently attractive to many migrant species...*" [Ewert and Hamas 1995].<sup>1</sup>

The Friends is concerned that Long Island, which is excluded from wilderness designation in Alternative C, is a key island for these birds. According to the Draft Wilderness Study, "... *Long Island[s] provide[s] key habitat for migratory birds*" [Draft, page 55]. "...*Long Island is important for waterfowl, passerines and shorebirds.*" [Draft, page 55]. **The National Park Service must ensure the continuing protection of these birds' habitat if Long Island is no longer protected as wilderness which it has been, *de facto*, since 1989.**

Furthermore, the Draft Wilderness Study states, "*Long Island is the only location where piping plovers have successfully nested in the state of Wisconsin in recent years*" [Draft, page 55]. The piping plover is an endangered species in the Great Lakes area. The coastal beaches traditionally used for nesting have been lost to commercial, residential, and recreational development.

On May 7, 2001 the U.S. Fish and Wildlife Service's final determination of critical habitat for the Great Lakes breeding population of the piping plover was published in the Federal Register [Federal Register 2001]. This final rule designated two critical habitat units within the Apostle Islands. The Western Michigan Island Beach and Dunes unit lies entirely within the Apostle Island National Lakeshore and is designated as "suitable" for plover use. The Long Island/Chequamegon Point unit lies partially within the Apostle Islands National Lakeshore and is designated as "current" for plover use.

*Continues next page*

7. The protection of the black bear population on Sand and Stockton Islands is beyond the scope of this wilderness study. Whether or not wilderness is designated in the park, we would continue to work with the Wisconsin Department of Natural Resources and the Great Lakes Indian Fish and Wildlife Commission to ensure that the black bear population is maintained. No new developments are being proposed on the islands that would affect the bears. If action is needed to protect the bears from an increase in human activity, which again could happen regardless of whether or not wilderness is designated, this would be addressed in a future management plan and environmental document.

8. We agree that Long Island is important habitat for migratory birds and critical habitat for the piping plover. Whether or not Long Island is designated as wilderness, the National Park Service would continue to protect Long Island's valuable habitat to help satisfy the purposes for which the park was established, as a natural zone in the park's current *General Management Plan*, and in the case of the piping plover as required under the Endangered Species Act. While wilderness might be a good way to ensure protection of critical habitats, it is not the only way.

With regard to section 7 consultations on the wilderness study, as noted on p.107 the study team initiated informal consultations with the U.S. Fish and Wildlife Service in June 2001. The Fish and Wildlife Service's response, on pages 116-117, stated that listed species or critical habitat would not be affected by the proposed activity, and noted there was no need for further action on this project.

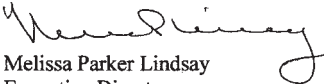
<sup>1</sup> Ewert, D.N. and M.J. Hamas. Ecology of Migratory Landbirds During Migration in the Midwest. In, Management of Midwestern Landscapes for the Conservation of Neotropical Migratory Birds. F.R. Thompson editor. General Technical Report NC-187, North Central Forest Experiment Station. U.S. Forest Service, U.S. Department of Agriculture.



Clearly, Long Island is an important refuge for birds, including the endangered piping plover. As non-wilderness, we fear the potential loss of this key bird habitat. Section 7 of the Endangered Species Act (ESA) states, "Each Federal agency shall, in consultation with and with the assistance of the Secretary, insure that any action authorized, funded, or carried out by such agency...is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species..." [16 U.S.C. § 1536 (a)(2)]. We, however, see no evidence of Section 7 consultation with the U.S. Fish and Wildlife Service. **We request that the final Wilderness Study include a discussion of how the Park Service will comply with its legal responsibility to not adversely modify or destroy critical habitat when Long Island changes from *de facto* wilderness to non-wilderness.**

Again, the Friends appreciates the opportunity to comment on the Draft Wilderness Study/Environmental Impact Statement for the Apostle Islands National Lakeshore. We look forward to receiving more information as the process progresses.

Sincerely,

  
Melissa Parker Lindsay  
Executive Director

  
Sarah Strommen  
Policy Director

/mpl

#### HOWARD COUNTY BIRD CLUB

9045 Dunloggin Court  
Ellicott City, Maryland 21042  
[krschwal@comcast.net](mailto:krschwal@comcast.net)

October 16, 2003

Apostle Islands National Lakeshore  
Attention: Wilderness Study  
Route 1, Box 4  
Bayfield, WI 54814  
[apis\\_comments@nps.gov](mailto:apis_comments@nps.gov)

To the National Park Service:

The Howard County Bird Club appreciates the opportunity to submit the following comments on the draft wilderness study and environmental impact statement for Apostle Islands National Lakeshore, Wisconsin.

Members of the Howard County Bird Club take an interest in this study, as the Apostle Islands have important values for birds and other forms of wildlife. The American Bird Conservancy has named the Apostle Islands as one of its Globally Important Bird Areas.

The Howard County Bird Club is an organization with a membership of more than 200 families and individuals in Howard County, Maryland. We are a chapter of the Maryland Ornithological Society, a nonprofit, statewide organization of people who are interested in birds and nature. Our purposes include promoting the study and enjoyment of birds, promoting knowledge about our natural resources, and fostering their appreciation and conservation. We offer field trips, bird counts, and conservation projects. Our members travel all over the United States to visit national parks, lakeshores and other federal lands on birding and nature-watching vacations. We spend dollars on food, lodging, books and souvenirs to support the local economy wherever we go. Moreover, birding is one of the fastest-growing outdoor sports.

#### Wildlife Values

In Apostle Islands National Lakeshore, breeding bird studies by NPS have recorded 150 species. More than 200 species of birds have been recorded there in NPS migratory bird surveys. Notable birds include Bald Eagle and Piping Plover, and both have been recorded nesting in the Apostle Islands. Some 37 species of mammals are known in the area, and the black bear is especially noted and often seen by visitors. In addition to the shoreline habitats, the islands are noted for their old-growth forest, a valuable remnant of the primeval forest that once covered so much of the region surrounding Lake Superior.

#### History

Apostle Islands National Lakeshore is situated in Lake Superior at the northern tip of Wisconsin. It includes 21 islands, ranging in size from 3 acres to 10,000 acres. The national lakeshore was created by an Act of Congress in 1970, championed by Senator Gaylord Nelson of Wisconsin. The wilderness study comes at this time because Congress in a FY 2001 appropriations bill directed NPS to conduct a wilderness study for Apostle Islands. Most of the National Park System was reviewed for wilderness potential in the years from 1964 to 1974 under the mandate of the Wilderness Act of 1964.

The Apostle Islands contain not only outstanding natural values, but historic features that are sought by visitors. These include six light stations dating from the 19<sup>th</sup> Century and pioneer homesteads. These features are excluded from the proposed wilderness areas, along with lands needed for visitor-use facilities and the waters between the islands.

#### Wilderness Recommendations

The NPS wilderness study analyzed four alternatives for designation as wilderness, ranging from no wilderness (Alternative A) up to a maximum of 94 percent of the land base (Alternative B). The NPS preferred alternative is Alternative C, covering 80 percent of the land base.

The Howard County Bird Club favors a modified Alternative C as proposed by Friends of the Boundary Waters. That modification adds most of Basswood Island to the areas recommended for wilderness designation. This island was found by NPS to have wilderness character, and it can be included in the wilderness by excluding a dock on the west side of the island and an old quarry on its southern tip.

The wilderness designation is a means of securing an added measure of protection of the natural values of the Apostle Islands. We cannot now foresee what threats may be leveled at the islands in decades to come, but the history of the National Park System is filled with development proposals hostile to park values. The protective language of the Wilderness Act of 1964 becomes part of the protective bulwark, in addition to the Organic Act of the National Park Service.

Members of the Howard County Bird Club know that wilderness designation has worked very well for Shenandoah National Park, Virginia. It is in our region and is often visited by club members. The wilderness designation was enacted in 1979, covering several tracts of the Blue Ridge Mountains. The park is readily accessible by state highways, county roads, and by the Skyline Drive running the length of the national park. From those roads we enter the wild lands on foot. Even from the roadside we enjoy the outstanding vistas of wild forest which are protected by the wilderness designation.

The same values should accrue to Apostle Islands National Lakeshore from the wilderness designation. You will have the most natural lands preserved with statutory protection, while the public will have ready access by kayak, motorboat and sailboat to the shores of the islands.

In conclusion, the Howard County Bird Club endorses the citizens' recommendations for wilderness and asks the National Park Service to modify the preferred alternative and include most of Basswood Island in the wilderness recommendation.

Thank you for considering our views.

Sincerely,

Kurt R. Schwarz  
President

October 17, 2003

Apostle Islands National Lakeshore  
Attn: Wilderness Study  
National Park Service  
Route 1, Box 4  
Bayfield, WI 54814

Dear National Park Service Staff:

On behalf of the Izaak Walton League of America, I wish to submit the following comments on the Draft Wilderness Study/Environmental Impact Statement for the Apostle Islands National Lakeshore. Please include these comments in the official record.

The Izaak Walton League of America is a national nonprofit conservation organization, first formed in 1922. The League's work is supported by a membership of 50,000 people across the country who fish, hunt, recreate in, and enjoy the outdoors. The League has a long track record of involvement in wilderness and public lands issues nation-wide.

The Izaak Walton League supports Wilderness designation at the Apostle Islands National Lakeshore. We believe that Wilderness designation best protects the wild beauty and wilderness character of the Apostles for current and future generations, and best protects the natural resources of the islands from degradation and development. Our specific comments follow.

**1. Plan Alternative.** The League supports Alternative B in the Draft Wilderness Study and Environmental Impact Statement. This alternative most closely matches how the Apostles have been managed over the past number of years, and would involve the least amount of change in management. As the Draft Plan states on page 29, "Of all the alternatives, alternative B would be most similar to how Apostle Islands National Lakeshore is currently being managed...."

Since adoption of the park's general management plan in 1989, most of the land mass of the Apostle Islands has been recognized as suitable for wilderness and managed as wilderness. This is in accord with the National Park Service's management policies to manage as *de facto* wilderness all those lands recognized as suitable for wilderness, at least until Congress had acted to actually designate formal Wilderness.

Alternative B would designate approximately 39,500 acres of land as Wilderness, all of it on the islands and none of it on the mainland. None of the waters surrounding

the Apostles would be designated as Wilderness. Under this alternative, approximately 57% of the park's lands and waters would be designated as Wilderness.

Alternative B would also exclude from Wilderness designation the non-suitable areas such as the light houses and associated cultural developments, public docks, the Manitou Fishing Camp, the housing and administrative areas on Stockton, Rocky, Oak, and East Bay of Sand Island, the southeast tip and West Bay Club of Sand Island, and the mainland strip of land.

This alternative would also provide Wilderness designation to Long Island. Long Island is especially important as habitat for waterfowl, passerines, and shorebirds. In particular, the U. S. Fish and Wildlife Service has designated Long Island as critical habitat for the piping plover, a federal- and state-listed endangered species. As the Draft Plan states, "Long Island is the only location where piping plovers have successfully nested in the state of Wisconsin in recent years." Wilderness designation would best protect this critically important habitat.

Alternative B also would preclude future developments in those areas of the park designated as Wilderness. The Draft Wilderness Study discusses future developments at length in the areas of the Apostles that would lose their protection as *de facto* wilderness, and Alternative B would tightly limit those areas that will lose this protection.

1. **2. Wilderness Suitability Criteria.** The discussion on page 10 of the draft plan implies that it is only through the Eastern Wilderness Act that Congress allowed for consideration of areas as wilderness that are no longer "pristine." It is not just the Eastern Wilderness Act that provides this guidance, nor is the discussion about "pristine" character accurate or appropriate.

The 1964 Wilderness Act, the federal law that established the National Wilderness Preservation System, provided two different sets of criteria for dealing with Wilderness areas, one set for how to qualify for Wilderness designation, and another for how areas are to be managed once they are designated as Wilderness. The two sets of criteria are not the same.

Section 2 (c) of the Wilderness Act established the criteria for areas to enter the National Wilderness Preservation System, and these criteria did not include any standard for being "pristine." Rather, this section says that a potential wilderness area "*generally* appears to have been affected *primarily* by the forces of nature, with the imprint of man's work *substantially* unnoticeable..." (Emphases added.) These are not standards for pristine character. Rather, Congress expected to and has designated areas as Wilderness that have been impacted by human manipulation and are not pristine. An example of such designation is the Boundary Waters Canoe Area Wilderness, where Congress designated as Wilderness areas that had clearcuts, resorts, or roads in them in both 1964 and 1978.

Section 4 of the 1964 Wilderness Act includes the higher standards of wilderness stewardship for lands once Congress designates them as wilderness. It is this section that sets out how wilderness areas must be managed ("there shall be no commercial enterprise and no permanent road...", "no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.") These are higher standards than those Congress set forth for designation, and these stewardship guidelines are the ones that approximate pristine character.

Therefore, it is not just the Eastern Wilderness Act that allows the designation of areas damaged by past human activity as wilderness, but the 1964 Wilderness Act as well. And Congress can and should designate parts of the Apostle Islands where humans have impacted the landscape, including such impacts as old farmsteads and old quarries.

## Responses to Izaak Walton League

1. The discussion about "pristine" areas being wilderness was included because during the course of the wilderness study process a number of people argued we should not be proposing any part of the park for wilderness designation because this is not a pristine landscape. We agree with your point that it is not just the Eastern Wilderness Act that allows for consideration of areas like the Apostle Islands as wilderness. Your discussion of section 2(c) of the Wilderness Act was in fact acknowledged on p.4 of the draft document. To clarify the text on p.10, the final study notes that in both the Wilderness Act and the Eastern Wilderness Act, Congress recognized that areas smaller than 5,000 acres that have been altered by past human activity can be designated as wilderness.

2. **3. Historical Interpretation within Wilderness.** Some public comments, articles, and the Draft Wilderness Study have all expressed a concern about the ability of the National Park Service to conduct historic interpretation, particularly of cultural resources, in areas that might be designated as Wilderness. This concern is, I believe, misplaced.

Historical values are recognized as a legitimate part and value of designated Wilderness. Section 2 (c) recognizes that Wildernesses contain features of "historical value." Section 4 (b) says that Wilderness areas should be devoted to a wide variety of public purposes, including "historical use."

The National Park Service can and should continue to conduct historical interpretation of sites in the Apostles even after these sites are designated as Wilderness. Wilderness designation does not preclude historical interpretation. The *level* of interpretation in Wilderness may not be as developed or intrusive as it might be in non-wilderness areas, where signage, interpretative displays, visitor facilities, etc., can be utilized. But the National Park Service can still conduct wilderness-appropriate historical interpretation in Wilderness areas, and the Park Service must not use this argument as a straw man to oppose a more extensive wilderness recommendation than that proposed in Alternative C, the preferred alternative.

3. **4. Future Development in the Apostle Islands National Lakeshore.** The preferred alternative, Alternative C, suggests fairly extensive future development for the Apostles in those areas that lose their *de facto* wilderness protection. Such development must not be allowed, and the Izaak Walton League opposes such development.

The Draft plan, for example, states on page 33 that Basswood and Sand Islands "are ideally suited for the expansion of interpretive opportunities, such as some limited facilities to help visitors understand the historical and natural processes on the Apostle Islands." On the following page, the Draft plan states that the former fishing community on Rocky Island "keeps open the possibility of providing additional visitor developments to accommodate increased use in one of the park's most popular areas." On the same page, regarding Stockton Island, the Draft plan continues that the new boundary would "keep open the possibility of providing additional visitor developments to accommodate increased use in the immediate vicinity of these popular areas."

The Apostle Islands National Lakeshore already provides ample facilities for its visitors, and new facilities are not needed. The Park Service must not delete areas from the agency's recommendation for Wilderness just so it can build more facilities and developments.

The Izaak Walton League of America appreciates the opportunity to comment on the Draft Wilderness Study and Environmental Impact Statement for the Apostle Islands National Lakeshore. The League supports Alternative B as the alternative that best protects the Apostles' wilderness character and best prevents the National Park Service from building unneeded and incompatible developments. Please keep us informed of the Wilderness study process as you move ahead.

Sincerely,

Kevin Proescholdt  
Midwest Director  
Wilderness and Public Lands

2. We agree that we can and should continue to provide historical interpretation of sites on the islands even after these sites are designated as wilderness, and that the level of interpretation in wilderness would differ from nonwilderness areas. However, in the case of Basswood and Sand Islands we believe opportunities for more intensive interpretation techniques, some of which would not be permitted in wilderness, should not be foreclosed. See also response 2 to the Friends of the Boundary Waters Wilderness and response 1 to Brandt Mannchen.

3. See responses 1, 2, and 4 to PEER, response 2 to the National Parks Conservation Association, response 2 to Friends of the Boundary Waters Wilderness, and responses 1 and 4 to Brandt Mannchen.



# NATIONAL PARKS CONSERVATION ASSOCIATION®

Protecting Parks for Future Generations®

October 14, 2003

Bob Krumenaker  
Superintendent  
Apostle Islands National Lakeshore  
National Park Service  
Route 1, Box 4  
Bayfield, WI 54814

Dear Mr. Krumenaker:

Thank you for the opportunity to comment on Apostle Islands National Lakeshore's Draft Wilderness Study and Environmental Impact Statement regarding the potential designation of wilderness in the national lakeshore.

The National Parks Conservation Association (NPCA) is a private, nonprofit organization dedicated to protecting and enhancing America's national parks for present and future generations. Approximately 300,000 Americans are members of NPCA, including 6,900 in Wisconsin and 6,200 in Minnesota. On behalf of these supporters of our national parks, NPCA expresses its appreciation to the National Park Service and the staff of Apostle Islands National Lakeshore for taking the first steps toward designating a wilderness area within the park's boundaries.

As you know, the park includes twenty islands of the Apostle Islands archipelago and a narrow strip of the Wisconsin mainland on the Lake Superior coast. These lands are a national resource of great ecological, historical and recreational value to our members and to the American people, and they merit the highest form of protection available to our public lands. Although the park's current General Management Plan requires that the park be managed as wilderness, this is a temporary protection that can too easily be reversed by future revisions to the plan.

**Accordingly, NPCA strongly supports the Draft Wilderness Study's preferred alternative (Alternative C), with the additional wilderness designation of those parts of Basswood Island not immediately surrounding the island's public dock or the quarry at the island's southern end.** If implemented by Congress, this revised alternative would provide continued opportunities to preserve and communicate the park's human history while extending permanent wilderness protection to a sufficiently extensive portion of the park.

## Qualification under the Wilderness Act

The Wilderness Act (16 U.S.C. §1131 through §1136) establishes several criteria that define wilderness and that narrow the potential scope of any wilderness designation within Apostle Islands National Lakeshore. As the park states in its Draft Wilderness Study, wilderness may include only "undeveloped Federal land," a requirement that disqualifies the state-owned waters and submerged lands that ring the park's federally owned islands, as well as the park's substantially developed mainland unit. The Act also requires that wilderness be "without permanent improvements or human habitation," disqualifying the handful of light stations, docks, and administrative facilities that are a permanent presence on some of the park's islands.

There is little question, however, that the remainder of the lakeshore's lands (39,500 acres, or 94 percent of the total) meets the statutory qualifications for wilderness. Indeed, the overwhelming majority of the park has already been managed as wilderness for years. Visitors to the lakeshore regularly enjoy camping, hiking, and other forms of "primitive and unconfined...recreation" on the islands, often arriving by kayak or motorboat before proceeding on foot into the backcountry. The interiors of the islands are isolated and undeveloped, and they support an increasingly wild ecosystem alongside the remaining artifacts of earlier human activity. The Wilderness Act requires that "the imprint of man's work [be] substantially unnoticeable," not wholly absent, and the park's islands meet this standard with the exceptions listed above.

## Choosing the Scope

Because so much of the park is eligible, the crucial question is how much of the park's eligible area should be recommended for wilderness designation. Although its enabling legislation does not specifically address the extent to which the park's wilderness character is to be preserved, other legislative acts provide clearer guidance. While the Wilderness Act offered only a general call to protect wild lands, Congress gave much more specific and pressing guidance in the subsequent Eastern Wilderness Areas Act, which identified "an urgent need to identify, study, designate, and preserve areas for addition to the National Wilderness Preservation System" "in the more populous eastern half of the United States." Congress further declared it to be "in the national interest that these and similar areas...be promptly designated as wilderness...."<sup>1</sup> While 28 years have elapsed since this Act's passage, legally protected wilderness remains scarce in Wisconsin, the Midwest, and in the eastern United States as a whole. Designating a substantial portion of the Apostle Islands as wilderness would represent a significant stride toward meeting Congress' objective of protecting wilderness resources where they are in short supply.

Ensuring a broad wilderness designation would also be consistent with the conditions spelled out by the State of Wisconsin in its agreement to donate the park's lands to the

<sup>1</sup> Eastern Wilderness Areas Act, P.L. 93-622, §2(a)(2) and 2(b).



1300 19th Street, N.W. • Suite 300 • Washington, D.C. 20036  
(202) 223-NPCA(6722) • Fax (202) 659-0650  
npcan@npcan.org • www.npcan.org

FOR THE NATIONAL PARKS CONSERVATION ASSOCIATION

federal government. Although the state's legislature recognized that the lakeshore would have multiple purposes, including "the benefit, inspiration, education, recreational use, and enjoyment of the public," it also explicitly stated that the islands were to "be managed in a manner that will preserve their unique primitive and wilderness character...into perpetuity."<sup>2</sup> States are quite understandably jealous of their sovereignty over their natural resources, and it is very rare that a state voluntarily chooses to give over some of its most inspiring and beautiful lands to federal ownership. The area of the park excluded from wilderness for other purposes should be minimized in order to honor the exceptional gift of the people of Wisconsin.

The park has offered two main justifications in the Draft Wilderness Study for recommending a wilderness designation that features such exclusions. First, the park is concerned that too sweeping a wilderness designation will prevent park staff from actively maintaining the park's cultural resources and fulfilling its obligation "to preserve and tell the stories of the Apostle Islands." In light of this concern, a handful of carefully chosen exclusions from wilderness designation would be reasonable.

Second, the park asserts that designating a wilderness area that has too few nonwilderness enclaves will leave future park staff with nowhere to install future developments except in the small areas surrounding the public docks, where they may do harm to cultural resources that sit just outside the wilderness area. This second concern has substantially less merit than the first.

1.

#### **Balancing Cultural Resources and Wilderness**

NPCA recognizes that the National Park Service must consider a number of priorities and obligations in crafting a recommendation for wilderness designation. The park's responsibility to maintain and interpret the cultural resources of the islands for visitors is an important priority, but it meshes imperfectly with the requirements of wilderness management. Fully preserving the physical evidence of human history and communicating its stories to visitors would require a degree of active maintenance and interpretive signage that is incompatible with the spirit and the legal requirements of wilderness. As a result, even though a modest extent of cultural resource upkeep is permitted in wilderness, some commentators have expressed an understandable concern that a wide-ranging wilderness designation will keep the park from interpreting and preventing the decay of its cultural resources.

Under the current circumstances, some trade-offs between the two priorities of wilderness and historical preservation are inevitable. However, the park has offered the basis of a reasonable compromise in its preferred alternative, Alternative C. Rather than allowing all of the park's human history to molder or insisting that each cultural resource of interpretive interest be actively preserved, the park would exclude two entire islands (Basswood and Sand Islands) on which preserving and interpreting a representative cross-section of cultural resources would be a top management priority. (The preferred

<sup>2</sup> Wisconsin Statutes, §1.026(1)(b).

Continues next  
page

#### **Responses to National Parks Conservation Association**

1. We believe there are other reasons to exclude Basswood Island from the wilderness proposal besides the need to protect, maintain, and interpret the park's cultural resources. By keeping the island as a nonwilderness area we would retain flexibility to provide limited developments in a small part of the park to address increasing visitation and/or provide for other visitor experiences that wilderness would preclude. See also response 2 to PEER.

alternative would also exclude a third island, Long Island, out of deference to the claims of local Indian tribes to the use of that land.)

This is a generally sound approach, but the park can protect and interpret a representative set of its cultural resources without excluding both Basswood and Sand Islands from wilderness. Because the two islands offer many of the same types of cultural resources, only the more developed Sand Island should be fully excluded. By itself, Sand Island would offer visitors a rich assortment of cultural resources, including a light station, old pioneer farmsteads, and the overgrown remains of roads, settlements, logging camps, and orchards. Because Sand Island does not contain any of the archipelago's brownstone quarries, the park should also exclude Basswood Island's quarry from the recommended wilderness area but leave the remainder of that island within the proposed boundaries. If revised along these lines, Alternative C would still offer park staff substantial flexibility in managing the park's cultural resources, leaving an impressive array of historical assets on Sand, Basswood, Stockton and Rocky Islands open to maintenance and interpretation.

2.

#### Allowing Room for Development

The Draft Wilderness Study cites the prospect of future development of park facilities on the islands as another factor in deciding the scope of a wilderness designation. Throughout most of the study, the park operates on the premise that such development would likely harm the park's resources and might occur in the future if park managers are not constrained by statutory wilderness protection. On this basis, the park rightly concludes that Alternative C (the preferred alternative) offers better protection to all resources than the no-action alternative or the much more modest Alternative D, which "would have more areas where natural and cultural resource impacts could occur due to future developments."

More dubiously, though, the study also concludes that Alternative B, despite designating the most expansive wilderness area possible, offers inferior protection to the park's cultural resources compared to Alternative C. The study argues that an overly broad wilderness designation would restrict any future developments "to a relatively few areas [outside lands eligible for wilderness] that also contain a high concentration of cultural resources," which would be adversely affected by the developments. Alternative C, on the other hand, would deny wilderness designation to certain areas adjacent to these concentrations of cultural resources, thereby offering "a broader range of options when planning future development, resulting in less pressure on individual locations" and cultural resources.

Although the end result of this development logic is the same as the result of the reasoning we supported above under "Balancing Cultural Resources and Wilderness" -- namely, a wilderness designation narrower than the maximum possible -- we find this particular argument to be unconvincing and likely to set a regrettable precedent. If the park is concerned that future managers will unwisely decide to allow development that causes collateral damage to cultural resources, it should not seek to *broaden* the geographical range in which these ill-advised developments may be installed. The park would be better advised to protect the resources in these nonwilderness areas by offering them temporary protection -- possibly through the park's General Management Plan -- than by denying permanent wilderness protection to areas that merit it.

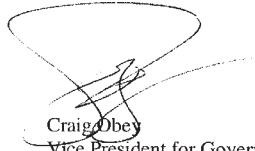
2. We disagree with the implication that any new developments would be "ill advised." There are a variety of legitimate reasons why new developments may be needed on the islands, which will be addressed in future plans (see p.68). We agree that the general management plan could be used to protect the park's cultural resources if new developments are built on the islands. And we would try to carefully locate any new developments in areas that do not have cultural resources, and to mitigate any possible impacts that could occur. But under alternative B there would be very few nonwilderness areas where these developments could be located on the islands. Those nonwilderness areas are rich in cultural resources, which would increase the chances of unforeseen impacts occurring to cultural resources that we are not aware of. (As noted on p.56 of the draft, there are likely many additional cultural resources that have not yet been discovered. See also p.82.)

## Conclusion

Many of the other concerns that often accompany efforts to designate new wilderness do not apply here, due in part to the park staff's admirable efforts to engage the local community and address its concerns. Because the park has placed the islands' public docks outside of the wilderness area in all of its alternatives, boat access to the islands will be unaffected. A substantial wilderness designation would also have a continuing positive impact on the local economy, since it would ensure the preservation of the wilderness character that attracts so many of the thousands of visitors who visit the park each year.

It is rare that such a strong consensus exists around permanently protecting such a valuable national resource as the Apostle Islands, and we urge the National Park Service to do all that it can to seize this opportunity. We thank you and your staff for your substantial efforts on behalf of this project, and we urge you to recommend the areas designated in Alternative C, modified to include the majority of Basswood Island, for statutory protection as wilderness.

Sincerely,

A handwritten signature in black ink, appearing to read 'Craig Obey', is written over a circular stamp. The signature is fluid and cursive.

Craig Obey  
Vice President for Government Affairs  
National Parks Conservation Association



Public Employees for Environmental Responsibility

2001 S Street, NW • Suite 570 • Washington, D.C. 20009 • 202-265-PEER(7337) • fax: 202-265-4192  
e-mail: info@peer.org • website: http://www.peer.org

Hearing Officer  
c/o Mr. Jim Nepstad  
National Park Service  
Apostle Islands National Lakeshore  
Rt. 1, Box 4  
Bayfield, WI 54814

August 29, 2003

Dear Hearing Officer:

In this letter Public Employees for Environmental Responsibility (PEER) submits its comments on the wilderness study for Apostle Islands National Lakeshore. We request that the Hearing Officer include these comments in the official record of the public hearing and as in the analysis of comments in the final environmental impact statement for the wilderness study.

PEER requests that the National Park Service adopt Alternative B – the "Maximize Wilderness" alternative. Under Alternative B, 39,000 acres, or 94% of the park's roadless land area, would be preserved and managed for its wild character. Since 1989, the NPS has managed, and is now managing, 97% of the park's land area as de facto wilderness. Alternative B would most closely approximate the protection now afforded these roadless lands.

By contrast, the NPS preferred alternative (Alternative C) would remove the current protections that now administratively safeguard 6,000 acres of roadless park lands. PEER opposes Alternative C because it is a step backwards.

Alternative B is not as far-reaching as the NPS draft would indicate. Even if adopted, Alternative B would designate only 56% of the park as wilderness. Motorboats will continue to operate in all of the waters within the park boundary, which constitute 27,000 acres (39%) of the park. Moreover, 6% of the park's lands, consisting of the mainland unit and some minor enclaves on the islands, would not be wilderness. Thus, under Alternative B, only those park areas qualified for wilderness preservation would be wilderness, with little or no disruption to established uses such as hunting, fishing, camping or motor boat landings.

1. The NPS' Preferred Alternative would eliminate from a wilderness proposal all of Sand, Basswood and Long Islands. By eliminating these islands from further consideration, the NPS would make possible future new developments that would change the character of the islands. PEER believes that the roadless portions of the three islands be maintained as they are for present and future generations.

Continues next

Field Offices: California • Maine • Montana • New England • Refuge Keeper • Rocky Mountain • Southwest • Tennessee • Texas • Washington



## Responses to PEER

1. Although it is true that future new developments could occur on the three islands that would not be designated wilderness, it is highly unlikely that developments would be permitted that would "change the character of the islands." Such developments would be contrary to the purposes for which the park was established by Congress. In all cases we would continue to protect the islands' resources and overall character in accordance with NPS plans and policies.



2.

The NPS rationale for eliminating the three islands from a prospective wilderness proposal is specious, contrary to law and at times, simply unexplained in the Draft Study.

#### **Basswood and Sand Islands**

The NPS proposes to eliminate from a wilderness proposal Basswood and Sand Islands "to ensure that future opportunities for interpreting the environmental history of the Apostle islands be preserved." Draft p. 33.

The Draft states that, without wilderness, the island would be "easier to manage" and the NPS would find "more opportunities to tell stories about the islands(s) and interpret resources in ways that wilderness would not allow..." Draft p. 34.

None of the NPS reasons for excluding the islands are valid. There is nothing in the Wilderness Act that precludes the NPS from interpreting the islands' natural or cultural features. Nor does the Wilderness Act prevent the NPS from telling "stories about the islands." The NPS states that it may want to develop the roadless portions of these islands "to provide for increased use." Draft p. 34. But even such developments would not preclude wilderness from the entire island but only from any small, developed areas.

PEER believes that an unspoken agenda is at work here. Perhaps, the NPS vision of a possible way to interpret the environmental history of the islands is to engage in, or authorize others to engage in, large-scale landscape manipulation. Among the possibilities that the NPS may be contemplating is reinstitution of human occupation through lease and sale of Federal lands under 16 U.S.C. 4601-22(a) or other mechanism, so that the new occupants can recreate past husbandry and commercial practices.

The NPS would allow this under the guise of restoring a "cultural landscape." And, yes, the NPS is correct, the Wilderness Act would preclude this as a possible way of telling stories about the islands.

PEER's suspicion is abetted by the NPS statement that excluding Basswood and Sand Islands "would provide for flexibility in planning the preservation and interpretation of pioneer farmsteads," "historic stone quarries" and "logging camps." Draft p. 83. In any case, the NPS must lay out what it means by preserving and interpreting these features. Since the NPS states that limiting the possibilities to interpret resources is the main reason to eliminate the islands from wilderness consideration, the NPS must be more specific about exactly which possible methods of preservation and interpretation would be foreclosed by wilderness designation.

The NPS states that Sand Island "still has extensive evidence of human occupation" as another reason for not including the island in the preferred alternative. Draft p. 34. But, in the 1989 General Management Plan, the NPS concluded "...that most of the park's land base was recovering and could reasonably be protected as wilderness." Draft p.9. That includes Sand Island. Such lands qualify for a wilderness recommendation to Congress both under the NPS Management Policies (2001) and under the intent of the Wilderness

2. Part of the mission of the National Park Service is to provide for visitor use and enjoyment of the units it manages. Not all visitors are seeking wilderness experiences, and the National Park Service is not required to propose all lands found suitable for wilderness as wilderness. In the case of Basswood and Sand Islands we agree that wilderness would not preclude the agency from interpreting features or telling stories. But we believe that by keeping these islands as nonwilderness areas, we would have flexibility in the future to provide limited developments to address increasing visitation and/or provide for other visitor experiences that wilderness would preclude. It is not the purpose of this wilderness study to determine if these facilities are needed, what they might be, and where they would be located (as noted on p.68). The facilities could include day use picnic areas, new group campsites, universally accessible paved trails, shelters, and amphitheaters. In addition, wayside exhibits or interpretive trails with signs could be provided in nonwilderness areas, which interpret resources in different ways than brochures or distant signs. (See the list of uses and developments prohibited in wilderness on p.5.) We do not foresee the need for, and would not permit, "large-scale landscape manipulation," or the lease and sale of federal lands to re-create past agricultural and commercial practices.

With regard to Sand Island, we do not believe that Senator Church's statement applies. Excluding Sand Island from wilderness would not be a "massive exclusion." There are several reasons why Sand Island was not included in the preferred alternative. As noted on p.34, the island still has extensive evidence of recent human occupation, and keeping the island as non-wilderness would keep open the option of providing for new developments to interpret stories about the island and to provide for increases in visitation. In addition, the proximity of Sand Island (as well as Basswood Island) to the Bayfield Peninsula and the number and variety of cultural sites it contains makes it well suited for the development of additional interpretive facilities. Indeed, in establishing the park Congress separated Sand Island from the other islands with regard to its intent to keep the islands wild and primitive (see Jordahl (1994) as referenced on p.6). Furthermore, keeping the island as nonwilderness would help acknowledge and preserve the history of many of the families that lived on the island. Finally, any wilderness area on Sand Island would be fragmented, and difficult to manage as wilderness, due to the presence of historic residences, structures, a campsite cluster, a ranger station, and tracts with various encumbrances (a nonfederal tract, areas with nonfederal mineral rights, and tracts with life estates and use and occupancy agreements) all scattered around the island.

Act. Senator Frank Church made this clear to then Assistant Secretary of the Interior Nathaniel Reed in the wilderness oversight hearings of May 5, 1972. Senator Church stated that

"[I]n the absence of good and substantial reasons to the contrary, (wilderness) areas within national parks should embrace all wild land. There is no lawful basis for massive exclusions (from wilderness recommendations) of qualified lands on which no development is planned." U.S. Senate Hearings, Subcommittee on Public Lands, May 5, 1972, pp. 59-60.

The NPS Draft proposes to exclude Basswood and Sand Islands (a relatively major exclusion in proportion to the whole) from a wilderness proposal in the absence of "good and substantial reasons."

For the foregoing reasons, PEER urges the inclusion of 99% of Basswood Island and 97% of Sand Island in the wilderness proposal.

3.
- Long Island**

The NPS fails to explain why Alternative C excludes Long Island from a wilderness proposal except for a brief reference to "cultural resources" on page 83. The Draft also points out that the Bad River Band of Chippewa expressed concern over Long Island being within designated wilderness. Draft p. 105.

Ninety-nine percent of Long Island qualifies as wilderness (i.e. all of the island except for the two light station enclaves). PEER calls upon the NPS to include Long Island in the wilderness proposal to the Secretary of the Interior.

4.
- The Backlog**

PEER advises the NPS to formulate wilderness and other decisions that will reduce, not increase, the growing liability of future construction and maintenance costs. It does little good to rail against the backlog of unmet maintenance needs if the NPS adopts proposals that will only add to that burden. Constructing developments or costly manipulative actions to perpetuate farms, logging camps and rock quarries on Basswood and Sand Islands would only add to the backlog.

More disturbing, such developments are unnecessary and come at the expense of the wild values for which Apostle Islands will be increasingly treasured.

**Summary**  
Alternative C excludes 6,000 suitable acres from the wilderness proposal that are qualified for wilderness designation. The NPS prefers Alternative C because the NPS may seek to halt the natural restoration of formerly disturbed lands and instead to perpetuate the human perturbations of farming, rock quarrying and logging facilities.

3.
- The text has been revised to indicate Long Island was excluded from the preferred alternative, and the rationale for not including it has been provided. Long Island is marginally suitable for wilderness designation due to the presence of two light stations and its narrow linear nature. The island has a high level of day use, which combined with the narrow nature of the island, limits opportunities for solitude during the summer months. In addition, the island would have required at least two areas of nonwilderness (the areas surrounding the two lighthouses) and possibly a third, making the boundary complex and the potential for wilderness acreage smaller. Finally, the Bad River Band of Lake Superior Tribe of Chippewa Indians did not support wilderness designation for Long Island because they believe it may be within their reservation and do not want an additional designation of the island to potentially interfere with that claim.
4.
- None of the alternatives included in this wilderness study, including the NPS preferred alternative, would necessarily add to the backlog of unmet maintenance needs. This wilderness study was not intended to address whether or not additional developments would be built or actions would be taken to perpetuate cultural resource sites on Basswood and Sand Islands. The study simply was intended to determine if areas within the park should be proposed for wilderness designation. For purposes of the analysis of impacts of wilderness designation, it was necessary to generally examine possible management actions and developments that might and might not occur in the wilderness and nonwilderness areas. It was assumed for purposes of this analysis that some developments would be built in the nonwilderness areas, consistent with the park's general management plan. But none of the developments analyzed in this study are being planned for or advocated by the National Park Service. No new developments on the islands would be proposed without first being analyzed in a future plan and/or environmental document, with opportunities for public involvement, and in compliance with the National Environmental Policy Act. Please see pages 67-69.

In light of the Organic Act mission of the NPS, the enabling act for Apostle Islands and the Wilderness Act, PEER urges the NPS to adopt Alternative C. That is the only alternative that aims at preserving the nascent wild character of all the Apostle Islands.

Sincerely,



Jeff Ruch  
Executive Director

cc: Senator Russell Feingold  
Senator Herb Kohl



SIERRA  
CLUB  
FOUNDED 1892

John Muir Chapter

Sierra Club - John Muir Chapter  
222 South Hamilton Street, Suite 1, Madison, Wisconsin 53703-3201  
Telephone: (608) 256-0565, Fax: (608) 256-4562  
csterrell@execpc.com; wisconsin.sierraclub.org

October 17, 2003

Wilderness Study Coordinator  
Apostle Islands National Lakeshore  
Route 1, Box 4  
Bayfield, WI 54814-9701

RE: Wilderness Designation of Apostle Islands National Lakeshore

Dear Wilderness Coordinator,

The Sierra Club-John Muir Chapter has over 13,000 members statewide who regularly enjoy the many recreational and scenic resources of Wisconsin. The Apostle Islands stand out as one of these gems and deserve national protection as designated wilderness.

The Sierra Club fully supports the National Park Service's efforts to permanently protect parts of the Apostle Islands National Lakeshore from any future development by designating them Wilderness Areas while maintaining historic and cultural aspects on them. Much of this area has been managed as wilderness since 1989, following a study that concluded over 97% of the lands in the Apostle Islands are suitable for wilderness designations.

The Sierra Club calls on you to designate the maximum amount of land of the Apostle Islands possible as wilderness area while keeping in mind that doesn't mean we must remove all traces of past human activity from the wilderness areas. We urge the National Park Service to expand your preferred alternative, Alternative C, in the ways outlined in the proposal "*A Shared Vision for Protecting the Rich Cultural Heritage and Remarkable Natural Features of the Apostle Islands*" endorsed by the Friends of the Apostle Islands National Lakeshore, July 31, 2003.

We concur with the *Shared Vision* statement that new legislation should formally designate as wilderness—the highest form of protection that any land can receive in the United States—the extensive portions of the park that so qualify, while also strengthening the mandate to interpret Apostle Islands history at appropriate locations and affirming ongoing recreational uses of the park.

In recognition of its existing wilderness values, Basswood Island should be added to the Wilderness proposal with the following exclusions:

- 1) At the dock on the west side of the island, including the existing campground development (consistent with similar exclusions elsewhere in the islands);



- 2) At the southern tip of the island south of an east-west line just north of the Bass Island Brown Stone Quarry.

We believe that these recommendations are consistent with Chapter 1, Section 1.026(b) of the Wisconsin Statutes (1985-1986) which transferred lands owned by the State to the National Park Service, requiring that the transferred lands on several islands, including Basswood, be managed to "...to preserve their unique primitive and wilderness character..."

1. Another addition requested by the Sierra Club is Sand Island. We urge that two-thirds of Sand Island be designated as wilderness and one-third be designated for cultural interpretation of human uses of the Apostle Islands prior to establishment of the national lakeshore. Sand Island represents an especially rich opportunity for historical and cultural interpretation, given the concentration there of sites representing most phases of Apostle Islands history

The Sierra Club also concurs with the concept of historic wilderness in the *Shared Vision*. Such areas include the historic light stations, Manitou and Hokenson Brothers fish camps, quarries on Basswood and Stockton islands, fishing and tourist cottages on Rocky Island and sites on Sand Island. The management and interpretation of these sites should emphasize mingled stories of human and natural history as expressed in the physical landscape, while always respecting the surrounding wilderness context.

The Sierra Club also endorses the *Shared Vision* stressing limits on development throughout the islands. Undeveloped lands not designated as wilderness that lie outside the vicinity of historic sites throughout the Park should be managed for their wilderness values, with a continued prohibition on mechanized access.

The Apostle Islands National Lakeshore could be the proving ground for the concept of historical wilderness explained so well by William Cronon in "The Riddle of the Apostle Islands," May-June 2003 *Orion*. We join Professor Cronon in asking the National Park Service to carefully consider: "How do you manage a wilderness full of human stories?" (p.1) We endorse and ask that the Park Service heed the important observations and ideas embodied in these excerpts from that article:

"The heretical notion that one might actually wish to protect and interpret a cultural resource in the very heart of wilderness so as to help visitors better understand the history of that wilderness is pretty much unthinkable under current regulations." (p.4)

"Apostle Islands National Lakeshore is and always will be a historical wilderness: for centuries in the past, and presumably for centuries still to come, human beings have played and will play crucial roles in these islands. Visitors should come away from the park with a deepened appreciation not just for the wild nature they find here, but for the human history as well." (p.5)

Response to Sierra Club

1. Please see response 2 to PEER.

“The interpretive framework that can best integrate the natural and cultural resources of this park is James Feldman’s concept of ‘rewilding’: ‘rewilding landscapes should be interpreted as evidence neither of past human abuse nor of triumphant wild nature, but rather as evidence of the tightly intertwined processes of natural and cultural history.’” (p.5)

“The default management assumptions should be that existing human structures and artifacts will not be removed even from designated wilderness. No erasures should be the rule except where absolutely necessary.” (p.6)

“An NPS commitment to interpreting all phases of Apostle Islands history would mean more than just tolerating the presence of romantic ruins in an otherwise wild landscape.” (p. 6)

“Think of wilderness in the Apostle Islands as existing along a continuum, ... from areas that will be treated as ‘pure’ wilderness (even though they are full of historical artifacts that should not be removed) to highly developed sites like the lighthouses that are managed almost entirely for nonwilderness values.” (p. 7)

“Sand and Basswood islands are the obvious candidates to be designated as historical wilderness.” (p. 7)

“Management policy in the National Lakeshore should seek to protect wilderness values and historic structures, certainly, but it should equally protect stories—stories of wild nature, stories of human history. It is a storied wilderness.” (p. 7)

The ongoing story of the “rewilding” of the Apostle Islands should be part of the interpretation provided by the Park Service.

The Sierra Club has written extensively in the past about the natural and cultural features that make the Apostle Islands so unique and worthy of national protection. (Comment letters by SC-JMC of Aug 8, 2002 and July 13, 1989 and national Sierra Club Board of Directors, July 19, 2002.). Today’s comment letter builds on these earlier letters and makes more specific our proposal for wilderness designation of the Apostle Islands.

Thank you for considering our comments. Please contact us when additional follow up is needed.

Sincerely,

Gary Werner, Chapter Conservation Chair



## THE WILDERNESS SOCIETY

October 16, 2003

Wilderness Study Coordinator  
Apostle Islands National Lakeshore  
Route 1, Box 4  
Bayfield, WI 54814

Dear Sir:

The Wilderness Society would like to thank the National Park Service for the opportunity to comment on Draft Wilderness Study at Apostle Island National Seashore. TWS has a special relationship with the Apostle Islands because of Senator Gaylord Nelson's, our Senior Advisor, involvement with the enabling legislation for the National Seashore. Therefore we hold especially dear this piece of property that he had the foresight to protect. Apostle Island National Lakeshore is a magnificent unit of the National Park Service with its 21 island jewels and 12 miles of shoreline along Lake Superior at the northern most tip of Wisconsin. The park is remarkable for its pristine stretches of sandy beaches, wave-formed rock and cliff formations with caves and arches interspersed between coves and beaches.

Since the inception of the Park, the islands have been managed for its wilderness character. With the current Wilderness Study/Environment Impact Statement underway, we are excited to be moving forward with a robust wilderness recommendation for the islands. TWS strongly urges the expansion of Preferred Alternative C to protect more wilderness by including Basswood Island. Please recall that the Park Service accepted certain stipulations when several of the islands were donated by the state of Wisconsin to the American public for creation of the lakeshore. The state legislature authorized the donation of Oak, Basswood, Stockton and Michigan islands to the federal government but required that "the Apostles be managed in a way that preserves the island's unique primitive and wilderness character" (Wisconsin Statutes 1,026 (1)(b)). Therefore, we believe the Park has legal, if not moral, obligation to recommend Basswood as suitable for wilderness designation.

Over the summer series of conversations between parties interested in the designation of wilderness at Apostle Islands resulted in a consensus document referred to as a "Shared Vision". The Vision supports the inclusion of Basswood in the wilderness designation with the exception of the quarry at the southern tip and the dock on the westside of the island. TWS believes exempting the dock and quarry on the southernmost tip of the island will allow Basswood's wilderness characteristics to be effectively protected and

permit continuing access to the island. These exemptions are consistent with exclusions elsewhere in the alternative. They include docks, fishing camps and historic structures such as the lighthouses found on the islands. It is also important to note that the proposal would not limit existing motor boat access around and between islands. No part of Lake Superior itself would be in wilderness and no existing docks would be removed or allowed to fall into disrepair.

Furthermore, over the years Sand Island has been managed to protect its wilderness character despite the concentration of structures on the island. Therefore it seems reasonable that the Park's preferred alternative does not include this island in its recommendation for wilderness. Despite this we would strongly urge that Sand Island continues to be managed as a wild landscape and that no additional development be allowed.

Last but not least, in recognition of former Senator Gaylord Nelson, author of the bill that designated Apostle Islands as a National Lakeshore, champion of wild places, and Senior Advisor to The Wilderness Society, we respectfully request that the National Park Service name this wilderness the Gaylord Nelson Apostle Islands Wilderness Area when it is formally designated.

Sincerely,

Susan H. Gunn, Ph.D.  
Director National Parks Program  
The Wilderness Society

October 16, 2003

National Park Service  
Apostle Islands National Lakeshore

Comments Regarding Wilderness Designation

1. As local residents living on the south shore of Lake Superior, we oppose the wilderness designation of the Apostle Islands National Lakeshore. One of our greatest pleasures is visiting the island beaches in our motor boat. They say this will not change, however, as Dave Sorenson so aptly noted in his recent commentary to the Daily Press, "the Wilderness Act specifically prohibits certain uses and developments, such as motorized equipment..." Certainly there are many people who enjoy this same privilege and want it to remain as is. The Town of Russell and the Bayfield County Board members DO represent the "local population" and therefore have voiced their opposition of the wilderness proposal. The Republican and Democratic political parties, the League of Women Voters, the Monday Club, etc., DO NOT represent the majority of those people closest to the islands.

Betty Good  
Raspberry Bay  
Town of Russell

Response to Betty Good

1. As we noted on p.26, the waters of Lake Superior were determined to not be suitable for wilderness designation. The text further states that the beaches on the islands below the high-water mark are not included in the wilderness proposal. Thus, none of the wilderness alternative proposals being considered in this study would affect motorboat access to the islands – if the NPS preferred alternative is adopted by Congress and wilderness is designated in the park, you will continue to be able to visit the island beaches in your motorboat.



Harold C. Jordahl, Jr.

21 S. Segoe Road  
Madison, WI 53705  
(608) 238-1087

9-10-03

Wilderness Study Coordinator  
A. I. N. L. Route 1, Box 4  
Bay View, WI 54814

I support designation of the A.I.N.L.  
as an addition to the National Wilderness  
System with the following caveats:

1. I support the document title "Shared  
Visions" which was developed & agreed to by a  
Citizens group with a deep interest in the  
matter

2. Attached is a copy of a letter to  
Gaylord Nelson of the Wilderness Society  
(6-3-03) which outlines in some detail  
my recommendations that Basswood  
Island be included in the Wilderness  
Designation with several exemptions

Sincerely  
Harold C. Jordahl

A Shared Vision  
for Protecting the Rich Cultural Heritage  
and Remarkable Natural Features  
of the Apostle Islands

Why A Shared Vision?

As the only National Park Service managed unit wholly within the boundaries of Wisconsin, the Apostle Islands National Lakeshore represents a uniquely valuable natural, recreational, historic, and scenic resource for the people of the state, the region, and the nation. The recommendations in this Shared Vision document seek to recognize, celebrate, interpret, and preserve these beautiful islands for all Americans and for all generations to come.

Supporters of this Shared Vision urge the National Park Service, Congress, and the President to act in a timely manner to reaffirm and strengthen Public Law 91-424, which created the Apostle Islands National Lakeshore for the "protection of scenic, scientific, historic, geological, and archeological features contributing to public education, inspiration, and enjoyment" and the "preservation of the unique flora and fauna and the physiographic and geologic conditions now prevailing on the Apostle Islands within the lakeshore." New legislation should formally designate as wilderness—the highest form of protection that any land can receive in the United States—the extensive portions of the park that so qualify, while also strengthening the mandate to interpret Apostle Islands history at appropriate locations and affirming ongoing recreational uses of the park.

Goal I: Apostle Islands Wilderness

To ensure that all appropriate and qualifying lands within the National Lakeshore are given the deserving protection of wilderness, this Shared Vision endorses Alternative C of the National Park Service Draft Wilderness Study and Environmental Impact Statement with the following modifications.

In recognition of its existing wilderness values, Basswood Island should be added to the proposal with the following exclusions:

- 1) At the dock on the west side of the island, including the existing campground development (consistent with similar exclusions elsewhere in the islands);
- 2) At the southern tip of the island south of an east-west line just north of the Bass Island Brown Stone Quarry.

1.

We believe that these recommendations are consistent with Chapter 1, Section 1.026(b) of the Wisconsin Statutes (1985-1986) which transferred lands owned by the State to the National Park Service, requiring that the transferred lands on several islands, including Basswood, be managed to "...to preserve their unique primitive and wilderness character..."

### **Goal II: Apostle Islands History**

In addition to protecting one of the nation's most beautiful wild landscapes in a region that has few areas of designated wilderness, a key mission of the National Lakeshore is to interpret the human and natural history of the Apostle Islands. Certain areas have been excluded from the designated wilderness both to facilitate the preservation of important historic sites and artifacts, and to encourage a wider range of interpretive possibilities than designated wilderness typically permits. These areas include the historic light stations, Manitou and Hokenson Brothers fish camps, quarries on Basswood and Stockton islands, and fishing and tourist cottages on Rocky Island. Sand Island represents an especially rich opportunity for historical and cultural interpretation, given the concentration there of sites representing most phases of Apostle Islands history. The management and interpretation of these sites should emphasize mingled stories of human and natural history as expressed in the physical landscape, while always respecting the surrounding wilderness context.

2.

### **Goal III: Limits on Development Throughout the Islands**

This Shared Vision recommends that undeveloped lands within Apostle Islands National Lakeshore be managed so as to maintain their natural, wild, and primitive character. Aside from the stewardship and interpretation of existing historic resources outside the designated wilderness according to the principles articulated in Goals I and II above, and aside from locations already developed for recreational purposes (which should be maintained to serve their current uses), new developments on the islands should be limited to wilderness-style trails and campsites. Undeveloped lands not designated as wilderness that lie outside the vicinity of historic sites throughout the Park should be managed for their wilderness values, with a continued prohibition on mechanized access.

### **Conclusion**

Supporters of this Shared Vision document believe that the strategies we've outlined here represent the best way to ensure the public's continued enjoyment and appreciation of the cultural, recreational, natural history, and scenic values which Apostles Islands National Lakeshore was originally created to preserve. We hope all who share our views will join us in working to assure that these extraordinary islands continue to be protected and managed for the benefit of all Americans.

AGREED (July 12, 2003):

Martin Hanson, Mellen WI	Hank Martinsen, Ashland WI
William Cronon, Madison and Bayfield WI	Carolyn Sneed, Washburn WI
Rebecca Rom, Minneapolis MN	Harold "Bud" Jordahl, Madison WI
Jeff Rennie, Bayfield WI	Ron Way, Minneapolis MN

*Endorsed by the Friends of the Apostle Islands National Lakeshore (July 31, 2003)*

## **Responses to Harold Jordahl**

1. Although the Wisconsin legislature directed that the lands it transferred to the federal government, including Basswood Island, be managed to preserve their "unique primitive and wilderness character," there is not a requirement that the islands be designated as wilderness in order to fulfill this direction – the National Park Service could administratively manage Basswood Island to protect its wilderness values without proposing the island for wilderness designation.
2. Although we expect that new developments would be limited on the islands, the wilderness study is not the appropriate process to determine what, if any, developments should be permitted and where they should be located. See also responses 1, 2, and 4 to PEER, response 2 to the National Parks Conservation Association, response 2 to Friends of the Boundary Waters Wilderness, and responses 1 and 4 to Brandt Mannchen.





June 3, 2003

Gaylord Nelson  
The Wilderness Society  
900 17 St. NW  
Washington, D.C. 20006-2596

Dear Gaylord:

Thinking about "wilderness" for the Apostle Islands brings back many memories. I was hiking and camping on the islands in the 1950s. In the winters we snowshoed on the islands to monitor deer conditions. In 1953 after an extensive survey, I re-introduced marten to Stockton Island (unsuccessfully). And, of course, in the 1960s, we put substantial effort into dealing with the lakeshore issues.

Given the mix of legal and administrative rules which govern the National Park Service, wilderness designation for the islands is somewhat complex. My brief answer, however, is to agree with the NPS and leave Sand Island out of the wilderness.<sup>1</sup> I'm satisfied with the small exceptions for lighthouses on the other islands and the Stockton Island exceptions.<sup>2</sup> With caveats, I believe Basswood Island should be wilderness. I will elaborate in the following paragraphs.

<sup>1</sup> Since writing this, Becky Rom called and Becky, Bill Cronan and Bob Krumenaker have agreed to recommend Sand two-thirds wilderness and one-third for cultural interpretation. I agree.

<sup>2</sup> Stockton represents what can happen. In the 1950s, I camped at the abandoned fish camp at Presque Isle Point, a delightful mix of cultural history and new islands forests. The Conservation Department subsequently acquires the island (a marvelous achievement) and immediately spends some \$80,000 on a large obnoxious breakwater and dock, and installs pit toilets, and a campground; later came an NPS ranger station and interpretative building. The developments encourage visitors, especially sail boats looking for safe dockage. The mystique and the cultural history is largely gone although to the credit of the NPS, a small portion of the fish camp is maintained and interpreted. The short hike to Julian Bay is lovely, although over used, and the signing could be deleted by providing the visitor with a brief brochure locating interesting geologic and botanical sites and let them make the "discovery". At Quarry Bay, my favorite little cove on Stockton, there is now a group campground, picnic tables, toilets, fire pit and a dock. The beauty and quietness of the cove is gone. All told, that portion of Stockton is changed, probably forever.

Department of Urban and Regional Planning

Old Music Hall University of Wisconsin-Madison 925 Bascom Mall Madison, Wisconsin 53706-1317  
608/262-1004 Fax: 608/262-9307 www.wisc.edu/urpl/

I concur with Cronan's position that cultural history is important. But where do you draw the line? My 220-acre farm, inhabited by Europeans for about 100 years, had "artifacts" littering the landscape. In fact, some areas were little more than junk piles. I removed the bulk of the junk, leaving a couple of horse drawn wagon wheels and a rusting disc tucked in an aspen grove as reminders of "what was". With a map, a visitor can locate the earthen depression of the first log cabin (circa 1860) adjacent a spring and a former trail and then a now-abandoned public road. When I serve as guide, I spend more time explaining the land-use history which in turn accounts for the differing forest composition, than I do on natural history. Guests are awed when they visualize and understand the results of natural processes albeit influenced to a degree with my modest attempts to guide those processes. Visitors with a more intense interest are shown the first aerial photographs (1937) with those of today. The differences are dramatic. (about a 40-percent increase in forest cover)

How does this apply to Apostles? Excluding a portion of Sand Island will permit the NPS to interpret European culture typical on many of the other islands (except for a brownstone quarry.) To my knowledge, there is little of great archeological significance on Sand or the other islands except for remnants on ancient glacial lake, beaches, and more human artifacts on present shorelines.<sup>3</sup>

3. Basswood Island is close to Bayfield and Red Cliff and highly vulnerable to over development and interpretation. It should be "wilderness." Although I am not favorable, a few acres of the

*Continues next page*

<sup>3</sup> My proposal to include a minimum of 40 acres at LaPointe for a national historical monument was included in the early lakeshore proposal. It was dismissed out of hand by a NPS historian who stated it had no significant national value. Fighting on a dozen different fronts to maintain the integrity of the overall lakeshore proposal, I decided not to take on the historian in Philadelphia. Moreover, I did not have the knowledge to argue with any persuasiveness, nor did I have a cultural historian on my Interior Committee to challenge the conclusion. Today, much of LaPointe's great value has been destroyed by harbor dredging, a marina and associated developments. However, one can grasp the archeological significance of the village by visiting the State Historical Society's museum, which incidentally we owe to the generosity of the Caspers who were great lakeshore supporters. Sand Island is easily accessible, still has artifacts and remnants of early white culture and lends itself nicely to historical interpretation. In fact, if the NPS has the money, it would be nice but not necessary to keep some of the old farm fields open and in agricultural crops typical of yesteryears practices (more on this later). As a caution, I urge the NPS to exercise extreme care and sensitivity on Sand Island and not to overinterpret with signs, trails and building preservation. The bulk of the acreage should revert naturally to "wild conditions" or as Cronan/Feldman say "rewilding").

3. While we agree that Basswood Island is suitable for wilderness designation and understand the concerns about future pressures for development, we believe there are justifiable reasons for not including the island in the NPS wilderness proposal. See response 2 to PEER and response 1 to the National Parks Conservation Association.



McCloud farm could be selected to illustrate island homesteading. Thus, the visitor would grasp the shifting and changing human use over time on the entire island. Yes, there are constraints in the 1964 Act and perhaps in the 1975 Act and NPS regulations. A little creative interpretation of these rules would be necessary instead of standing firm on rigid national regulations. I have visited with Becky Rom on several occasions on these matters. I've read Cronan's material and believe he can do these things within existing parameters. If NPS is adamant, let's add a few words to the wilderness designation making cultural history interpretation possible. Also, keep in mind that the Apostle Islands Act requires that historic features are to be protected. It's nonsense, of course, to destroy any cultural resources on this or any island which tell important historical stories. If NPS is rigid, the McCloud farm could be excluded from the rest of the island, but I do not prefer this option. Stone fences and old foundations, though overgrown with vegetation, will still tell the story.

Cronan makes the point that cultural resources should not be destroyed. With caveats, I agree. Unfortunately, some which are now gone, should have been protected. Another example, The Coast Guard, which in my experience looks at the world through a myopic lense, used a helicopter to lift the historic small light from the western end of Long Island and crumpled it into the adjacent scrub oak and jackpine. This was the only light of its kind in the Great Lakes system. Even with the help of Dave Obey they beat us. Subsequently, I urged NPS to put the pieces together and re-establish it near the original location. It would be a nice historic contrast with that obscene phallic blue tube which they erected and which now automatically emits light to caution boaters. I do not know if anything was done. I might add that the Long Island lighthouse is on the national register.

Keeping Basswood wilderness would still permit the NPS to have a brief interpretative brochure and map available on the boat dock which would identify the location of cultural artifacts. But, please, please, I say no to signs on trails; let the hikers have some sense of discovery when they locate an artifact, and even a greater sense of discovery when they trip, stumble and fall over an

unmarked, rusted farm implement in the interior forest.<sup>4</sup> Lastly, Basswood, to my knowledge, has no cultural resources that are unique and significant to the entire archipelago. Sand Island represents the typical situation.

All the islands are vulnerable; Basswood even more so. Outdoor recreation technology has changed dramatically. Remember when we were planning the lakeshore the following was the case; sailboats were few; snowmobiles were in their infancy; sea kayaking was unknown, snowshoeing was for foresters, "landlookers" and biologists; cross-country skiing was unheard of; jet-boats did not exist; wind surfing was yet to come; dogsled excursions to the islands was never envisioned; scuba diving; shipwreck exploration was in its infancy and kite sailing was unheard of. What's next on the part of challenged and oft-times affluent outdoor recreationists and even more challenged engineers and manufacturers who see new ways to make lots of money with new equipment sales? The ingenuity of the human mind coupled with the profit motive can easily make any informed projections we make obsolete. When we were writing the legislation, even with plenty of help from many disciplines, we simply could not visualize the future. Perhaps personal aircraft will be next on the scene, and then what? And as Becky Rom points out, leaving Basswood out of wilderness will put even more pressures on it for development.

For financial and perhaps legal purposes, cultural protection, rehabilitation and interpretation on all the islands is not realistic. (Over a 35 year period, I know the labor involved and the cost of maintaining even small openings on my revegetating farm. And it never ends.) While not as exciting as stumbling across an old piece of rusting farm or logging equipment tucked among island corners, a visitor can grasp the human and ecological history of the islands by spending several hours in the Northern Great Lakes Visitor Center a few miles west of Ashland. I spent seven long years working on that project and recall very well the sometimes bitter arguments we had over historical preservation.

<sup>4</sup> I remember going through the badlands with my family - my wife and four children - on the NPS interpretative and scenic road. Half way through, all of us were sated and kids began to wonder when we would get home. During the 6600 car trip to the southwest and west coast we had perhaps reached our limits. A brief video or a short summary in a colorful brochure would have sufficed leaving us to look with eyes that now had some minimal understanding of geological forces and having the excitement of "discovering" them. Those images and the "discovery" will last longer in our memories than a sign telling us what we are looking at.

Economic interests wanted a romanticized version and a current visual image of vast, lovely untouched "virgin" forestlands. I insisted on an honest representation of a great tragic natural resource and human history. A visitor can make their own judgment on how well we do with a thoughtful visit to the Center. I am delighted that the Center now receives 110,000 visitors annually, and the numbers are increasing.

I am also excited with a new project which the Center is undertaking. Briefly, plans are to "prepare a multi-dimensional indoor-outdoor exhibit that will trace the landscape sequence of cultivation and ethnicity of Wisconsin's Lake Superior region, using maps, imagery, narrative and expressive site elements". Collaborators include Dr. Janet Silbernagel (U of W-Madison, Dept. of Landscape Architecture) and her associates Arnold Alanen (U of W-Madison, L.A.); Ruth Olson (U of W-Madison, Center for Study of Upper Midwest Cultures), Joseph Rose (Northland College, Native American Studies), James Leary (U of W-Madison, Folklore Studies). This team will demonstrate ethnic history and cropping and horticultural plant practices on the Center grounds.

At the present time Steve Hoecker, Center Director, advises me that the historic dairy barn (1917) needs a new roof. To maintain the integrity of the barn, the issue is whether the roof can be metal or cedar shakes. This is great because I argued that the barn and adjacent fields be protected and interpreted as an important part of the Northern Great Lakes cultural history. The Forest Service's first thoughts were to raze the barn.

There is another example of cultural interpretation. I am encouraged with the USFS beginning steps to hire archeologists to identify and protect cultural resources on the national forests, including the nearby Chequamegon. For example, Susan Nelson, USFS, Park Falls, initiated a modest study and wrote a report of a Swedish farming community just south of Grandview, a few miles from the Center. This report is available to Center visitors. Other museums which should be noted include those at Ashland, Cable, Washburn, NPS headquarters in Bayfield and the State Historical Society on Madeline Island.

A basic understanding of the history of the region can be gained by visiting these sites and then with a visit to the islands "discovering" a cultural artifact and understanding the reasons for a "new" young forest. Then the visitor can think through the dynamics of shifting and changing social structure, economics, technology and plant succession, all of which becomes a great personal experience. A sign at a cultural site which attempts to tell a story is a poor substitute.

In summary, Sand Island is highly suitable for modest and sensitive island interpretation; a brownstone quarry can be easily viewed along STH 13 south of Bayfield (perhaps a turnout is necessary), at the tip of Basswood Island (some tree clearing necessary to see it from a boat). Because the Basswood quarry is in the national register, some special measures may be helpful – a brochure and modest trail perhaps, but no more. There are other quarries on other island sites. Furthermore, there are millions of other public lands in the Northern Great Lakes where land use can be interpreted and managed to reflect cultural history. In fact, there are additional potentials on the doorstep of the Apostle Islands at the Center. The barn could house a few cattle, along with a modest agricultural museum. Early crop practices will be demonstrated on the land which is still in fields. (The house has no historic value.)

We have small bits – postage size bites – of "wilderness" in Wisconsin and the Eastern U.S. Let's seize this opportunity to add to this modest legacy.

Sincerely,



Harold C. Jordahl, Jr.  
Emeritus Professor



"Judziewicz, Emmet"  
<Emmet.Judziewicz@u  
wsp.edu>

To: <apis\_comments@nps.gov>  
cc:  
Subject: Comments of APIS draft wilderness study and EIS

09/07/2003 03:34 PM  
EST

Robert Krumenaker  
Superintendent, Apostle Islands National Lakeshore

Dear Bob,

I received the Apostle Islands National Lakeshore Draft Wilderness Study/EIS and would like to add my comments to the public record.

First of all, I am glad that the study is finally complete and that we may be moving towards designating a significant part of the Lakeshore as federal wilderness. On a personal level, I worked with Mike Van Stappen over the years and know that this issue was near to his heart and one that he did a lot of work on. He would be pleased, I think, to see that progress is being made.

Your choice of Alternative C is a good start, but I think it is insufficient to preserve the unique biodiversity of the Lakeshore. Several critical areas are left out that should have been proposed for wilderness protection:

1. Long Island and that part of Chequamegon Point that is included in the National Lakeshore. This dynamic barrier island/spit system is an absolutely unique natural feature in Wisconsin and one that is uncommon and endangered elsewhere in the Great Lakes region. I'm sure you are aware that it is one of the few breeding grounds for the federally endangered piping plover in the Midwest.  
  
I was informed by Tom Doolittle that one reason that Long Island and that part of Chequamegon Point that is included in the National Lakeshore were not included within the preferred alternative wilderness area is that the Bad River Band of the Ojibwe tribe claims to own this land outright by treaty. This may or may not be so and is a matter that will surely eventually be adjudicated by a court. Even if the decision goes against the Park Service, it will at least settle the matter. I hope that you will find the strength to hash this problem out during your tenure as superintendent; someone will eventually need to fall on this particular "grenade."
2. The Stockton Island double tombolo at Presque Isle Point. This is another unique feature in the entire Lake Superior region. The present campground at Presque Isle precludes any re-establishment of a natural fire regime on the tombolo that would maintain the present red pine forest and savanna. The campground should be moved to a less sensitive area, say "Anderson Bay" a mile or two to the west; that would allow the tombolo to be designated as wilderness, and natural processes to operate.
3. Sand Island. I fully understand that this island is heavily utilized by kayakers and day visitors and that the fine historic building along the east coast, especially at Shaw Farm, need to be protected. However, there is no reason that 80% of Sand Island - say all of it except a 1/4 mile wide strip on the east coast from the Lighthouse to Shaw Farm - could not be designated as wilderness. The West Bay Club, when I visited it in 1992, was in a ramshackle condition and is probably in worse condition now. Is there any serious possibility that the Park Service will find funds to stabilize, let alone renovate this structure? I seriously doubt it. Designate the

Continues next page

## Responses to Emmet Judziewicz

1. Although we agree that Long Island is a special natural feature and deserves protection, that is not, by itself, a sufficient reason for designating the island as wilderness. The island is currently administratively protected as a natural area zone in the park's current *General Management Plan* and we do not foresee this changing. With regard to the piping plover and Bad River Band claim on the island, see response 3 to PEER, response 8 to the Friends of the Boundary Waters Wilderness, and response 9 to Brandt Mannchen.
2. See response 6 to Friends of the Boundary Waters Wilderness. The question of whether the campground on Presque Isle needs to be moved is beyond the scope of this study. We would consider the need for this action in a future management plan.
3. We believe there are good reasons to not include Sand Island as wilderness. See response 2 to PEER.

westernmost 80% of Sand Island as wilderness and let the West Bay Club decay back to nature, as you are doing with, for example, the Bear Island and Outer Island logging camps.

I was glad to hear that Eagle Island and the Outer Island sandspit will be included in the wilderness area under Alternative C and that their exclusion in the EIS was simply a typo.

For all of these reasons, I strongly support a modified Alternative B, which would preserve about 90% of the Lakeshore federal wilderness. I do agree with Alternative C, however, in that I believe that Basswood Island can be "sacrificed" to light development such as, perhaps, expanded docks and campgrounds.

I look forward to following the wilderness designation process.

Sincerely,

Emmet J. Judziewicz  
Assistant Professor of Biology  
Director, Robert W. Freckmann Herbarium  
CNR 301  
Department of Biology  
University of Wisconsin-Stevens Point  
Stevens Point, WI 54481  
(715)-346-4248  
<emmet.judziewicz@uwsp.edu >

Visit our new web site devoted to Wisconsin Plants at  
<<http://wisplants.uwsp.edu> >



"Maureen Kinney"  
<Maureen@johnsflaherty.com>

08/05/2003 02:39 PM  
EST

To: <APIS\_Comments@nps.gov>  
cc:

Subject: I am concerned that the new designation of wilderness for the  
apostle islands national lakeshore wil

1.

I am concerned that the new designation of wilderness for the apostle islands national lakeshore will outlaw the possession of pets on boats and on shore(even leased as now required). I believe that this would be one very undesirable result of wilderness status. I also have concerns that the new status may result in limiting hunting, and or fishing opportunities within the park.

## Response to Maureen Kinney

1. Wilderness designation would have no effect on the possession of pets on boats or on shore, although the current requirement to keep pets leashed on the islands would apply in both wilderness and nonwilderness areas. Wilderness designation also would have no effect on hunting or fishing opportunities in the park, as noted on p.5.





"John C. Laney"  
<manannan@citizens-t  
el.net>

To: <APIS\_Comments@nps.gov>  
cc:  
Subject: Apostle Islands

09/02/2003 03:36 PM  
EST

Dear Sirs:

The wilderness designation is the most restrictive land use classification. According to the 1964 Wilderness Act it would be applied to "an area where earth and its community of life are untrammelled by man."

That certainly doesn't apply to the Apostle Islands which have been lived on and used by people for thousands of years before Europeans came in the 1600's. After that the emigres and their descendants farmed, fished, lumbered and built fishing boats until the NPS took over management of most of the islands in recent years.

Despite the ethnic cleansing practiced by the U.S. before and especially after the Civil War, the indigenous people still live here, as do the offspring of the immigrants. Their life is not easy now that lumber, mining and railroad industries have left the area and government management practices have made commercial fishing very difficult. Tourism and service are now viable industries and hold the promise of more jobs for the future.

- 159
1.

2.

3.
- |    |  |
|----|--|
| 1. | However, applying the wilderness designation to the Apostle Islands would have the effects of reducing access and recreation, and cost jobs to the local community.  |
| 2. | It would also be anti-management and anti-good stewardship by leaving the islands vulnerable to the blowdown of timber as happened in 1999 in the Boundary Waters and the area just east of Ashland. Because of the wilderness designation in the Boundary Waters, cleanup could not begin and a huge area was left open to the possibility of uncontrollable forest fire and/or insect infestation. |
| 3. | The entire notion of a pristine wilderness - untouched, pure, virgin nature - is a 19th century fantasy... and profoundly mistaken.<br>The Apostle Islands are being managed all right now. Don't mess with them. Don't push for the wilderness designation. You could well end up hurting them and their people.<br>John C. Laney, Ph.D.<br>S/V Manannan, Erickson's Boatyard<br>Bayfield, WI       |

## Responses to John C. Laney

1. As noted on p.19, none of the alternatives in this study would affect access to the park by currently legal means. The impact assessment notes that there would be some impacts on recreation, such as opportunities to picnic, and limits on the potential for expansion of recreational facilities. But most visitors' recreational activities would not be noticeably affected. We also disagree that local community jobs would be adversely affected by wilderness designation for the reasons stated on pages 19-20.
2. Timber blowdowns, wildfires, and insect infestations are naturally occurring events that could occur on the Apostle Islands whether or not wilderness is designated. It is true that wilderness would limit what could be done on most of the islands if a timber blowdown were to occur – under NPS policies all actions taken to suppress wildfires would be required to use the minimum requirement concept and be conducted in such a way as to protect natural and cultural features and to minimize lasting impacts of the action. But this condition does not rule out taking actions to minimize the possibility of an uncontrolled wildfire or insect infestation due to a blowdown. (Section 4(d)(1) of the Wilderness Act specifically provides for measures to be taken as may be necessary to control fire, insects, and diseases.) It is also worth noting that due to logistical, financial, and policy constraints, it would be extremely difficult to clean up a blowdown on the Apostle Islands even if the islands were not designated as wilderness.
3. Wilderness can be designated in areas that are not pristine. See response 1 to the Izaak Walton League, response 3 to Citizens Against Apostle Islands Wilderness, and response 2 to Celeste Peltier.



ml  
<ml@iexposure.com>  
10/16/2003 11:06 AM  
CST

To: <apis\_comments@nps.gov>  
cc:  
Subject: Public Comment

\*\*\*\*\*  
An Apostle Island Wilderness?

1.

I recently discovered, to my astonishment, that the National Park Service has, for the last few years, been soliciting comments on creating a new wilderness area. This is astonishing to me because I live within 300 miles of the area and have not heard a thing about this proposal. I consider myself well informed and get my news from a variety of local and alternative sources and maybe more importantly, I am a wilderness enthusiast and receive information directly from environmental groups. While I applaud the attempts at getting public comment and holding local forums for discussion around the proposed area, a greater effort is needed by the National Park Service, advocacy groups and others to get input from wilderness and park users from across the country since this is a national land use issue. An especially important group to reach out to for comment would be the constituents who may visit the new wilderness, especially those who currently explore other already designated areas in the wilderness preservation system who may have written off the Apostle's as not being a wilderness. I may have simply missed this one issue although after reading the article in Orion Magazine by William Cronon I visited the official web site for the project and found that only 5,000 comments were received the first year in 2001 and 1,800 in 2002, and those appeared to come from mainly the local pro-motor camp, so it appears that many others 'missed' the issue as well. Even with all the support from the motorized lobby the National Park Service is saying 80% of the comments were in favor of wilderness protection although it appears they want a wilderness with noise.

2.

Is a motorized wilderness really a wilderness? Will it weaken the whole wilderness protection system? The National Park Service says that Lake Superior is not protectable under the Wilderness Act so it has to allow motors around the islands. It is my understanding that the Wilderness Act cannot allow motors under its guidelines. So we are seemingly in an impossible situation, people want motors and wilderness together. We only need to look at the Boundary Waters Wilderness in Minnesota to see the motorized question has been debated for many years and it is not an 'all or nothing' answer. Motors are allowed there, unfortunately, in some areas. These areas are very limited and occur on the edges of the wilderness thus still preserving a continuous motor free wilderness. I propose a compromise on motors that will preserve both the wilderness act and the wishes of the pro-motor constituents to insure the area receives wilderness protection. Let us keep in mind that each situation is unique when considering land use issues for land is unique.

In the Apostle Island's we are given a situation of inner and outer islands. Let us work out a plan to actually achieve a real wilderness feel for at least the core areas, like the boundary waters, and not allow motors to the inner islands and create a motor free 'path' to the inner area so the canoes, kayaks and other potential nonmotorized access devices can at least have an 'untrammelled' access. One nonmotorized path could be between York and Oak Islands extending north-east to North Twin and Cat Islands.

I support Maximum Wilderness here and in any location that it is even remotely possible. Why? We live in a world of urbanization and noise that is so complete many of us must travel for hours and hours to get anywhere that even looks, feels and sounds like it might be wild or contain an intact ecosystem. Our impacts are felt everywhere. William Cronon pleads for saving 'romantic' structures and interpreting the failures of peoples attempts at

## Responses to ML

1. The National Park Service has sought public input throughout the wilderness study process, and has provided numerous opportunities for the public to participate. We published newsletters, held public meetings and workshops, and used the Internet extensively to inform people about the study. In addition, the study was publicized by the local and state media. During the course of the study we received comments from across the country as well as from many local residents. The vast majority of the comments we received were in fact supportive of wilderness designation. Please see pages 103-105 for a summary of all the efforts that were made to publicize the study and solicit comments before the draft document was published, and in this document see the section titled "Public Review of the Draft Wilderness Study / Environmental Impact Statement," which identifies all the public meetings (and one hearing) that were held after the draft document was published.
2. As we noted on p.26, the waters of Lake Superior were determined to not be suitable for wilderness designation. Your proposal to designate motor-free paths to the inner islands is not an alternative that we can consider. The state of Wisconsin has jurisdiction over the waters beyond the park boundary, so we could not limit motorboat use on the waters between the islands. Even if we could do so, such motor-free paths would be very difficult for visitors and managers to discern, making it difficult to enforce the prohibition on motors. The motor-free paths also would do little, if anything, to enhance the wilderness experience, since the sounds and views of motorboats would still be apparent in the areas outside the paths.

working against the lands ecology. While there is sure to be lessons learned from peoples attempts at making a living on the land isn't that what books are for? History books, biographies and many other genres contain important testimonies immortalizing the joys and hardships of peoples lives. Maybe the Apostle Islands need a good story teller to document the happenings, romantic and not so romantic, just like everywhere else in the world.

We have far too many reminders of humans quest to control and change the land and far too few examples of the ways that many peoples around the world existed in greater balance with the earth. There is human made junk on the moon, outer space, across the countryside and sprawling across every city around the world. If we were to try to salvage and interpret all of human civilization we would have interpretive signs and markers in virtually every inch of land on earth. Think of all the events, historical facts and artifacts just in Europe alone, the entire place would be covered by signs and kiosks. I also find it interesting to look at a particular piece of the Earth and after discovering some artifact or odd feature ask, what happened here? However, I do not want a world where only humanities invention and mess is allowed to survive, and not God's creation and evolution. One old orchard in the Apostle Islands while it might be interesting to look at is not a cultural landmark. Many ancient orchards through out the world are destroyed every year by war and urbanization, some hundreds and even thousands of years old, not the decades or so of history in the orchards of the Apostle Islands. Does silicon valley have an interpretation of the huge groves and orchards that once existed there? What about the tribes and native life that flourished even before colonization and domestication radically altered the landscape?

Humanities legacy is to often about destruction and conquest over the environment and it's peoples. Shouldn't we restore as much as we can to it's intact legacy of ecological balance where some small remnant might survive to interpret more than just the last 100 or so years. What about eons of life that came before without motors, roads and modern convenience.

M.L



September 28, 2003

Mr. Bo Krumenaker  
Superintendent  
Apostle Islands National Lakeshore  
Attention: Wilderness Study  
Route 1, Box 4  
Bayfield, Wisconsin 54814

Dear Superintendent Krumenaker,

Enclosed are my personal comments regarding the Draft Wilderness Study (DWS)/Environmental Impact Statement (EIS) for the Apostle Islands National Lakeshore (AINL).

1) **On page v, Summary**, first paragraph, let us hope that a formal wilderness proposal will be submitted (not may be) to the Director of the National Park Service and that the Department of the Interior and the President will submit this proposal to Congress for its consideration. There is no doubt in my mind that lands in the AINL possess wilderness characteristics and are deserving of designation as wilderness. I support designation of wilderness on the AINL.

2) **On page vi, Summary, Alternative B**, I support the maximized wilderness alternative of 39,500 acres, which is about 57% of the entire park (lands and waters) within its boundaries. People need more places they can go, without the sights, sounds, and use of mechanized civilization so they can get in touch with their connection to Nature and to their own being. Such places provide for physical, spiritual, and mental well being not found elsewhere. Please note on page vii, Summary, Environmental Consequences, that "No impacts were identified due to wilderness designation that would require mitigation measures."

1. 3) **On page ix, Summary, Visitor Nonwilderness Experiences**, other than removal of several picnic tables, what is the moderate, long-term, adverse impact on visitor' nonwilderness experiences that wilderness designation will have. NPS states in several places in this DEIS that "managers' flexibility to expanded recreational and interpretive facilities into new area" will be affected. However, NPS never quantifies this supposed impact and never says where this will occur and what facilities will be impacted. NPS needs to be more definitive about this impact. It is not clear why NPS cannot use brochures and other informational devices in place of signs to gain the understanding of the park and its significance that NPS says will be harmfully impacted.

4) **On page 5, Uses and management in Wilderness**, it is not clear to me how much activity NPS can conduct for fire management (fire suppression) and correction of past mistake or impacts of human use in wilderness. For instance, why would NPS want to suppress natural fire? This would be counter to allowing

Responses to Brandt Mannchen

1. It is not possible to quantify or to be more definite about the impact on managers' flexibility. As noted on pages 67-69, this study is not a management plan and is not intended to address questions regarding what facilities would be developed either in the wilderness or nonwilderness areas. However, for purposes of the assessment of impacts of wilderness designation it was necessary to generally examine possible management actions and developments that might and might not occur in the wilderness and nonwilderness areas. It was *assumed* for purposes of this analysis that some developments would be built in the nonwilderness areas, consistent with the park's current and future general management plans. Because it is difficult to know what development(s) might be built where, the potential consequences of the alternatives can only be analyzed in general terms using qualitative analyses. Future general management plans and implementation plans will address these questions in more detail and will have their own NEPA analysis documents.

With regard to the use of brochures and other information materials, we are not saying these media cannot be used to gain an understanding of the park and its significance in wilderness. But there would be fewer opportunities to use certain interpretive media in those areas that are wilderness, such as wayside exhibits or self-guided, signed interpretive trails, that could enhance visitors' understanding and appreciation of the park. As noted on p.90 of the draft, foregoing these opportunities could have a negligible to minor adverse impact on visitors experiences compared to alternative A where there would be no restrictions on the use of these media.

the ecosystem to be self-willed as required by the Wilderness Act. NPS does not have carte blanche to take such management actions. It is important for NPS to acknowledge its limitation in wilderness including humility to hold back and allow Nature a free hand and not conduct actions because they are easy to do.

5) **On page 12, Wilderness Study Process**, last paragraph, it is not acceptable to me, as an owner of the AINL, that the Secretary of the Interior recommend to the President no lands be recommended to Congress for wilderness designation. This option should not be considered because it is not necessary or appropriate for AINL.

6) **On page 15, Natural Resources (General)**, it is important for NPS to understand in this process that "Wilderness designation would not substantially affect either the management of natural resources, such as vegetation and wildlife in the park, or uses within the park that could affect these resources."

2. 7) **On page 33, Alternative C**, third paragraph, For Basswood and Sand Islands, if there are "some limited facilities to help visitors understand the historical and natural processes on the Apostle Islands" why not remove these areas from wilderness and designate the rest of the island as wilderness? NPS needs to explain why entire islands must be nonwilderness if only a small portion may require interpretive facilities.

8) **On page 28, Alternative A**, I do not support this alternative. I want wilderness designated for the AINL.

9) **On page 29, Alternative B**, I support Alternative B because wilderness is a vanishing resource, there is too little of it, and it serves purposes that other, more common, types of public land management cannot serve.

3. 10) **On page 33, Alternative C**, second to last paragraph, what are the "valid rights" that NPS would continue to "honor and respect?"

4. 11) **On page 34, Alternative C**, what specific development is NPS taking about when it states, "and keep open the possibility of the island accommodating additional development to provide for increase use" for Sand Island, Rocky Island, and Stockton? Is the increased use desirable and what impact will it have? I do not support Alternative C.

12) **On page 37, Alternative D**, I am opposed to this alternative because it will allow too little wilderness and provides the opportunity for too much development.

5. 13) **On page 37, Alternative D**, what are the use and occupancy reservations on Bear Island?

2. As noted on p.33, alternative C strives to minimize the fragmentation of areas of wilderness or nonwilderness – the alternative tries to minimize small isolated pockets of wilderness or nonwilderness. It is much easier to manage an area and for visitors to know what they can and cannot do if everybody knows that most of an island is wilderness or nonwilderness. Additionally, it is not possible to know at this point in time if and where interpretive facilities might be located on the islands – keeping the islands as nonwilderness areas maximizes the flexibility of managers to locate interpretive trails or other media in the best locations. Finally, keeping the islands as nonwilderness retains the possibility of providing additional limited developments to accommodate increased use, such as day use picnic areas or a group campsite.

3. Several people have use and occupancy reservations, which will terminate in the near future, or life estates to cabins on Rocky and Bear Islands. There are nonfederal mineral rights outstanding on these islands. The Town of Russell also owns a tract of land on York Island. All of these landowners have legal rights that the National Park Service will respect whether or not wilderness is designated in the park.

4. It is not possible to specifically state in this study what additional developments, if any, would be provided, for the reasons noted in response 1. As stated on p.68, developments that *might* be considered on these islands include new campsites, picnic areas, trails, expanded dock facilities, or additional structures to serve visitors or house island-based park employees. The type, number, and location(s) of such developments, if needed, and an assessment of their impacts would be addressed in a future plan/environmental document, such as a new general management plan.

5. There is one private life estate on the sand spit on the south end of the island.

- 14) **On pages 42-43, Environmentally Preferred Alternative**, I believe the NPS has skewed this analysis to try to make Alternative C appear to be the environmentally preferred alternative. It is obvious that Alternative B is the environmentally preferred alternative and will protect wilderness, biological diversity (including ecosystems) wildlife, migratory birds, water quality, quiet, solitude, soils, air quality, and other resources better than Alternative C. In addition, Alternative B ensures that there is less development because lands are restricted to wilderness. The AINL is a sensitive habitat that cannot take large numbers of visitors. By allowing more lands to develop, Alternative C ensures that the NPS will have an incentive to develop more. NPS states that Alternative B has a "higher potential for cultural resource impacts in the nonwilderness areas because of future developments" but then does not specifically state where this will occur and what cultural resources will be impacted. NPS also states that somehow Alternative B does not "preserve and tell the stories of the park onsite as well as Alternative C." Since NPS can provide brochures to tell the story there is no need to install interpretive exhibits and signs at such locations. In addition, docks and the areas surrounding these docks that can have interpretive signs to provide more information.
- 15) **On page 44, Alternative Considered But Dismissed**, NPS does not state why it must have "growth areas" on several islands for more recreational and other uses. Demand must not drive what the NPS does. What is required is a thorough study of what the carrying capacity of each island is for certain uses under certain scenarios. This is not provided here for the different alternatives so the public cannot assess whether too much development is planned in relation to wilderness designation. The fact that few people support Alternative 2 is not a reason to drop the alternative. The Council on Environmental Quality's regulations require that "all reasonable alternatives" be analyzed. The regulations do not say all reasonable alternatives that have the support of the public will be analyzed.
- 16) **On page 45, Table 3, Summary of Impacts**, the table does not define the terms minor, moderate, negligible, etc.
- 17) **On page 55, Wildlife**, if Long Island is important for migratory birds like piping plovers, passerines, waterfowl, and shorebirds then protection of this important habitat via wilderness designation for all or part of Long Island is appropriate.
- 18) **On page 56, Archeological Resources**, where are the 60 archeological sites that have been found on AINL in relation to wilderness proposals? Which islands are they on? The public needs this information to assess the appropriateness of the different alternatives for wilderness designation.

6. This is a summary of the environmental consequences. For details on the impacts, see pages 80-85. Again, it needs to be pointed out that due to the broad nature of the study and the alternatives, the impact analysis is general and qualitative.
7. Although the National Park Service can provide brochures, and interpretive signs can be installed in the areas by the docks, other on-site interpretive media, such as wayside exhibits or signed self-guided trails, are not permitted under NPS policy in wilderness. Exhibits and interpretive trails can provide information on-site that cannot be provided the same way in a brochure or in a distant sign. Because most of the islands would be in wilderness under alternative B, there would be fewer opportunities to use these media, compared to alternative C. Thus, we do not believe that alternative B would preserve and tell the island stories as well as alternative C.
8. The analysis of carrying capacity is beyond the scope of this wilderness study. The question of what developments are needed and visitor use levels are more properly addressed in a general management plan and/or wilderness management plan. See also response 1.
- With regard to the dismissal of the alternative, we agree that few people supporting an alternative is not a reason by itself to drop a reasonable alternative. This was only one of several reasons for dismissing the alternative. (The primary reasons it was dropped, as noted on p.44, is that it is very similar to alternative B and it had very complex, hard to define boundaries.)
9. The presence of migratory bird habitat is not one of the criteria for identifying an area to be suitable for wilderness. Protection of important migratory bird habitat also is not, by itself, a sufficient reason for designating an area as wilderness. Whether or not Long Island is designated as wilderness, the National Park Service would continue to protect this valuable area to satisfy the purposes for which the park was established, as a natural zone in the park's current *General Management Plan*, and in the case of the piping plover as required under the Endangered Species Act. See also response 8 to Friends of the Boundary Waters Wilderness.
10. The locations of the archeological sites are sensitive information and under the provisions of the Archeological Resources Protection Act are not open to public disclosure. However, as noted on p.56, nearly all of the islands have some record of human occupation. Whether or not the islands have archeological sites has no bearing on the different wilderness alternatives – the presence or absence of archeological sites was not a factor in developing the alternative wilderness proposals.

11. 19) **On page 57, Historic Structures**, where are the 163 structures that have been found on AINL in relation to wilderness proposals? Which islands are they on? The public needs this information to assess the appropriateness of the different alternatives for wilderness designation.
12. 20) **On page 60, Visitor Nonwilderness Experiences**, many of the recreational activities and experiences that are listed can also be conducted in wilderness. These are not necessarily nonwilderness experiences only. For instance camping, picnicking, kayaking, hiking, swimming, fishing, hunting, photographing, bird watching, and berry picking can all be done in wilderness.
13. 21) **On page 68, Introduction**, should demand for new picnic areas for large groups be met? NPS does not have to meet demand and carrying capacity figures must be developed for different areas and different recreational activities to ensure that overuse does not occur. Since NPS has a shortage of personnel, money, and equipment how can it build visitor contact stations, storage facilities, shelters, restrooms and amphitheaters on islands? NPS must be clear and honest with the public what it intends to do on islands or parts of islands that are designated as wilderness or nonwilderness. This DEIS does not give a clear indication of the type, extent and location of development that will occur.
14. 22) **On pages 70-72, Methodologies for Analyzing Impacts**, NPS fails to define many key words or phrases for the intensity of impacts on natural resources, cultural resources, wilderness resources, visitor nonwilderness experiences, and park operations. This prevents the public from fully understanding the impacts that NPS allots to each alternative. Some of the words or phrases that must be defined include: barely noticeable; extremely localized; slight but noticeable; clearly noticeable; appreciable effect; highly noticeable; substantial change; small number; appreciable park wide effect; highly noticeable and widespread; barely detectable; slightly detectable; clearly detectable; severely adverse; exceptionally beneficial; substantial, and highly noticeable influence.
15. 23) **On page 73, Cumulative Impacts**, I disagree that initiatives to outsource services provided by NPS will not result in a cumulative impact. It is obvious that NPS has some of the most dedicated employees in the entire federal government. Those who are contracted to do the job will not care or perform at the level of NPS personnel. In addition, reduced law enforcement staff, an inadequate law enforcement staff, or a law enforcement staff that is preoccupied with duties other than patrolling AINL will result in cumulative impacts due to less protection of resources.
16. 24) **On page 74, Cumulative Impacts**, how does NPS know that new concessions contract for tour boats "probably would not change existing use patterns of the park or substantially change use levels"?

11. Like the archeological sites, most of the islands have historic structures. Only Eagle and North Twin Islands are not known to have historic resources. Although the interpretation of historic resources was considered in developing the alternatives, the locations of the historic resources on the islands was not a major factor in distinguishing the wilderness alternatives and does not affect the appropriateness of the alternatives.
12. We agree that most of these experiences can also occur in wilderness areas. The intent of this paragraph was to give an overview of all the experiences offered on the islands.
13. We agree that we do not have to meet demands for new picnic areas and that there is a need to identify carrying capacities to ensure that overuse does not occur. However, this is beyond the scope of this study. We also are not proposing that new developments be built on the islands. Please see responses 1, 4 and 8 above.
14. The impact intensities in this wilderness study / environmental impact statement are necessarily general and conceptual given the broad nature of the study and its alternatives. The terms you refer to were meant to assist the reader in understanding the relative intensities of the impacts. Standard dictionary definitions are adequate for understanding what is meant by these terms. See also response 1.
15. Although there could be a cumulative impact due to initiatives to outsource services provided by NPS staff, this impact would occur regardless of whether or not wilderness is designated in the Apostle Islands – the impact would be independent of wilderness. We have revised the text to state that the initiatives would not have a cumulative impact with respect to wilderness designation.
16. This statement is based on past visitor use trends; tour boat capacities, routes, and schedules; and our professional judgment. We cannot state for certain that use patterns and levels would substantially change, however, which is why the word "probably" was used.



25) **On page 74, Cumulative Impacts**, I do not agree that “no ongoing or foreseeable actions” would result in cumulative effects. NPS must do a better job on cumulative impacts.

17. 26) **On page 75, Impairment of Park Resources or Value**, NPS does not recognize that other developments, that occur outside wilderness, could impair wilderness values and character due to spillover use, over use, and carrying capacity exceedences. I do not agree that impacts “cannot be analyzed in the nonwilderness areas due to uncertainty regarding what actions might be taken where and when, and what resource values might be affected.” This is a copout. NPS knows what types of facilities might go where, what the current trends show, and can give a reasoned estimate of impacts.
18. 27) **On page 76, Alternative A**, second paragraph, scour caused by wave action patterns due to dock structures could cause additional erosion and fishery impacts.
19. 28) **On pages 77-78, Alternatives B & C**, how many and where will the campsite facilities mentioned be constructed in wilderness areas? What impacts will these have?
20. 29) **On page 83, Alternative B, Conclusion**, NPS does not provide a map which shows where cultural resources are so the public cannot assess for itself any impact differences between the alternatives.
21. 30) **On pages 83-84, Alternatives C & D**, NPS does not mention and quantify what the greater opportunity for development will be and the greater environmental impacts will be in Alternative C versus Alternative B.
22. 31) **On page 86, Alternative A**, define “near future” with regard to new development.
23. 32) **On page 87, Alternative C**, second paragraph, define what “minor to moderate, long-term, adverse impacts” are.
24. 33) **On page 89, Impacts on Visitor Nonwilderness Experiences**, first paragraph, a number of the activities mentioned, like camping, picnicking, swimming, socializing, and sunbathing can be done in wilderness. They are not limited to nonwilderness.

17. The impairment determination is focused on impacts caused by the alternatives for wilderness designation that would adversely affect park natural and cultural resources to such a degree that there is an impairment of park resources and values. We are not proposing any new developments as part of this wilderness study – external developments and uses in non-wilderness areas are not part of the study alternatives and consequently are not considered as part of the impairment determination. With regards to impacts in nonwilderness areas and the possibility of impairment, we disagree with your assertion that the potential is there. See response 1.
18. While some of the park’s docks have caused impacts (especially to the transport of sediments just offshore), we are not aware of scour from wave action ever being identified as a problem in the park.
19. It is not possible to state in this document if any campsites would in fact be built in wilderness or how many and where the campsites would be constructed. (See response 1.) However, if campsites were built, the text very generally describes impacts to soil compaction, vegetation, and wildlife that would occur.
20. Please see responses 10 and 11.
21. As stated in response 1, we are not able to quantify opportunities for development in the alternatives. However, there is no "greater opportunity" for development in alternatives C and D, compared to alternative A, the no-action alternative. In fact, as the text notes, relative to alternative A these wilderness alternatives would have a lower potential for new development on most of the islands.
22. We have changed the text from "near future" to foreseeable future.
23. The adverse impacts, including fewer opportunities for solitude and primitive, unconfined recreation, and impact on apparent naturalness are noted in the 1st paragraph of the analysis on p.87.
24. We agree that these activities can take place in the wilderness as well. But in this section we are focusing on impacts on these activities in areas that are not designated as wilderness.

25. 34) **On page 89, Alternative A**, the number and impacts of more group campsites are not enumerated here.
26. 35) **On page 89, Alternative B**, on page 68 NPS says trails can be built in wilderness. Here NPS says that trails with interpretive signs cannot. If there is an alternative, like use of a brochure, then why is this considered to be a hindrance and analyzed as a negative impact?
- 36) **On page 90, Alternative B, Conclusion**, I consider it a positive benefit of Alternative B that the "potential for substantial expansion (which is not defined) of recreational or visitor use facilities would be limited under this alternative."
27. 37) **On page 90, Alternative C**, expansion of group campsites and picnic areas means more impacts which are not enumerated here. In addition by providing more of the "most visible edge" between wilderness and nonwilderness NPS potentially sets the stage for more illegal use because people will be conducting more nonwilderness activities right next to more wilderness areas. What are the impacts of this decision?
28. 38) **On page 93, Alternative A**, NPS states that emergencies would be responded to more fully since there would be equipment on the islands in Alternative A that could help with emergencies. Another impact is that if people know there is more emergency equipment on the islands they will not come as prepared and will expect NPS to get them out of situations quicker and more efficiently. This will increase NPS's liability. This impact should be discussed.
29. 39) **On pages 93-94, Alternative A**, NPS needs to say that with more development there will be more maintenance, that use of chainsaws and motorized vehicles are difficult to get out to the islands, and needs to state how much facility maintenance workloads could increase.


25. The impacts of more group campsites are identified in the 1st paragraph of the analysis. We cannot project the number of group campsites that might be provided under alternative A. (Indeed, it is not certain that any group campsites would be built.) The need for these facilities would be addressed in a future plan. See also response 1.
26. The text is not saying that trails with interpretive signs are a negative impact. Rather, because certain new recreational facilities (including these trails) would be confined to a relatively small area, crowding could increase, which could have an adverse impact on visitor nonwilderness experiences.
27. The impacts of group campsites and picnic areas are addressed in the 1st paragraph of the analysis on p.90. With regard to having the most visible "edge," we disagree that there would be more illegal use due to people conducting more nonwilderness activities next to wilderness. We do not foresee illegal activities, such as visitors riding off-road motor vehicles in wilderness. Activities that might be illegal in wilderness do not generally occur on the Apostle Islands now and there is no reason to expect they would occur in the future. And as the text notes, there would be more opportunities to educate visitors about wilderness and its role, which would further reduce the likelihood of illegal activities.
28. The text does not state that more emergency equipment will be provided. Rather, it states that there is the possibility that the park's ability to respond to emergencies could be enhanced, although the need for additional, fully equipped, island-based locations is currently fairly low. There is no reason to believe visitors would expect the National Park Service to respond to visitor emergencies any differently. There is also no reason to expect an increase in liability due to visitor expectations.
29. The text states on the top of p.94 that workloads could increase and could result in a moderate to major adverse impact on park facility management operations. It is not possible to quantify this, given the large number of uncertainties regarding future facilities (numbers and locations, if any), staff levels, and funding. See also response 1.

30.

40) **On pages 94-95, Alternative B**, NPS states that less development means that there would be less need for interpretive services. I believe this may not be true. NPS personnel can still visit islands and interpret, they can develop brochures and other items to assist someone in wilderness, can continue to place signs in appropriate places, and they can continue to provide visual media at stations. Since there are readily available alternatives (brochures) as alternatives to signs there should be no significant impact. It is of concern that NPS does not appear to believe that 2,500 acres is enough to develop (6% of the AINL) in Alternative B. This leads one to the concern about how large an area NPS actually wants to develop and what development it actually wants to construct. These impacts are not revealed in this DEIS.
31.

41) **On page 96, Alternative C**, second paragraph, it seems obvious that Alternative C requires an increased effort in protection of natural and cultural resources since there will be higher visitor presence, use, and facility development.

I appreciate this opportunity to comment. Thank you.

Sincerely,   
Brandt Mannchen, 5431 Carew  
Houston, Texas 77096  
H713-664-5962, W713-640-4313

30.

We agree that less development does not necessarily mean there is less of a need for interpretive services. We also agree that NPS staff could still visit islands and interpret, develop brochures, place signs, and provide visual media in alternative B. But relative to alternative A, where there *could* be more potential interpretive developments, the need for interpretive personal and nonpersonal services would be less. It is not certain that services would be reduced under alternative B, but if they were the text states that there *could* be a minor adverse impact on the park's interpretive operations. It is not known how large an area would need new interpretive developments, if any, and this study is not intended to answer this question. See response 1.
31.

We disagree that there would be an increased workload for cultural and natural resource staff under alternative C. Higher visitation levels could occur under all of the alternatives, not just alternative C, which could increase workloads. But compared to alternative A, there would likely be fewer developments, which would reduce the need for compliance-related activities.

October 17, 2003

Mr. Jim Nepstad  
Wilderness Study Coordinator  
Apostle Islands National Lakeshore  
Route 1, Box 4  
Bayfield, WI 54814

Dear Mr. Nepstad,

Thank you for the opportunity to comment on the "Draft Wilderness Study" pertaining to proposed wilderness designation for the Apostle Islands National Lakeshore. (I first submitted a letter on proposed wilderness designation to the Park on 15 January 2002.) I am very familiar with the Lakeshore and have worked on bird studies with different park ecologists since 1974. I was also involved with Rep. Obey's office in 1986 to add Long Island to the ATNL as the last remaining feather, if you will, in the Park Service's hat. It is the future of Long Island that concerns me now, and I am perplexed to see that it has been excluded from the list of islands proposed for wilderness designation.

Since 1975, Long Island has been connected to Chequamegon Point to form a unique barrier spit, arguably the most important and pristine of any on Lake Superior, and perhaps the Great Lakes. Long Island may become, as it has historically, a barrier island due to high water and storm surge, but there is no likelihood of that happening any time soon. Ecologically, the island stands apart from its sister islands because of its barrier status, diverse plant communities that occur across 12 parallel sand ridges, and from an avian ecologist's perspective the most important staging area for migrating shorebirds on western Lake Superior. On beaches, sandbars, ephemeral dune pools, and along edges and openings of the "Sand Cut" area, I have observed over the years the following shorebirds: Black-bellied Plover, Lesser Golden Plover, Semipalmated Plover, Piping Plover, Killdeer, Greater Yellowlegs, Lesser Yellowlegs, Willet, Spotted Sandpiper, Upland Sandpiper, Whimbrel, Hudsonian Godwit, Marbled Godwit, Ruddy Turnstone, Red Knot, Sanderling, Semipalmated Sandpiper, Least Sandpiper, White-rumped Sandpiper, Baird's Sandpiper, Pectoral Sandpiper, Buff-breasted Sandpiper, Dunlin, Short-billed Dowitcher, Long-billed Dowitcher, Common Snipe, and Wilson's Phalarope.

Long Island is the only location in Wisconsin and on western Lake Superior where the state and federally endangered Piping Plover nests. I have surveyed all potential breeding Piping Plover habitat in the state and nothing comes close to the quality of the undisturbed beach and dune complex that characterizes the southern end of Long Island, which serves to attract nesting Piping Plovers.

For the above reasons, Long Island certainly deserves to be included among the islands proposed for wilderness designation. To argue that current policy sufficiently protects the island is no different than those who question why the Park is pursuing wilderness designation when it would result in so little change. The answer, as your articulate Superintendent has stated, lies in the question. In this case, wilderness status affords a

*Continues next page*

## Response to Sumner Matteson

1. See response 3 to PEER, response 8 to the Friends of the Boundary Waters Wilderness, response 9 to Brandt Mannchen, and response 1 to Emmet Judziewicz.



layer of protection that ensures our children and grandchildren will enjoy the same Apostle Islands experience we do, and that Piping Plovers, too, will have the opportunity to breed on western Lake Superior for generations to come.

Finally, I understand that the issue of Native American treaty rights is the basic reason why Long Island has been excluded from the list of islands proposed for wilderness designation. One of the elders from the Bad River tribe, Joe Rose, told me recently that he would support wilderness designation for Long Island if treaty rights were retained. I would think that treaty rights would have to be respected regardless of the U.S. government's wilderness designation. Perhaps I am misinformed on this latter point, but in any event the draft wilderness study points out that the Park has managed the islands "to preserve their wilderness values," with the Park's 1989 *General Management Plan* stating that about 97% of its lands were suitable for wilderness designation. This ostensibly includes Long Island. Without wilderness designation, the door would remain open for development to occur at some point in the future and that would be incompatible with the island's present wilderness state.

I hope you will modify the preferred alternative (Alternative C) to include Long Island. Please consider giving it the protection its unique status deserves.

Sincerely,

Sumner W. Matteson  
Avian Ecologist  
5101 Coney Weston Place  
Madison, WI 53711-1105

To Whom It May Concern,

1.

As a resident in the area of the Apostle Islands and a person that fishes around them, I am greatly opposed to designating them as a wilderness. I have been to wildernesses. The Boundary Waters Canoe Area in Minnesota and Cloud Peak in Wyoming. Those places are located where they can be wildernesses. The Apostle Islands ARE NOT. Sure, you can call it wilderness but it isn't. Furthermore, with the restrictions that come with wilderness designation, I
2.

fear the trouble I will get into when I have I am on the lake in my boat or when ice fishing should I have to go ashore for whatever reason. I'll have things with me that aren't allowed in wilderness and my boat or snowmobile or atv will be motorized.
3.

The islands are pretty nice as they now are. Your superintendant says they are being "managed like wilderness" so there is no need for the designation. WILDERNESS DESIGNATION TAKES AWAY FROM OLDER PERSONS.

Please do not designate the islands as wilderness.

Sincerely,

M. James Nemec  
65605 Nemec Road  
Mason, WI 54856

Responses to M. James Nemec

1.

Wilderness can be, and has been, designated in areas that are much smaller and with much different conditions than the areas you cited. See also response 1 to the Izaak Walton League, response 3 to Citizens Against Apostle Islands Wilderness, and response 2 to Celeste Peltier.
2.

We do not foresee the need for additional restrictions on visitor use based on wilderness designation, although changes in future visitation patterns, visitor numbers, activities, resource conditions, etc., could require new restrictions in the future regardless of whether or not wilderness is designated in the park. You cannot legally drive your snowmobile or an ATV now on the Apostle Islands, regardless of wilderness. You should have no problems, however, when you are using your boat and have to go ashore.
3.

We disagree that wilderness designation would take away access from older persons. All people, including the elderly, will continue to have access to the islands via motorboats, sailboats, etc., and can walk on the islands like they currently do.

**To:** Wilderness Study Coordinator  
Apostle Islands National Lakeshore  
Route 1, Box 4  
Bayfield, WI 54814

**From:** Celeste Peltier  
835 Ole Hanson RD  
Eureka, CA 95503

**Date:** 10/13/2003

**Re:** Apostle Island Wilderness Designation Plan

---

**To Whom It May Concern:**

The purpose of this letter is to present a critique of the Draft Environmental Impact Statement (DEIS) regarding the wilderness designation of the Apostle Islands National Lakeshore. This draft EIS examines alternatives for the wilderness designation of the Apostle Islands. The Apostle Islands were given to the State of Wisconsin to be administered by the National Park Service. Law designates that all lands administered by the National Park Service be evaluated for their suitability for inclusion within the national wilderness preservation system. I will review several points including; procedural criteria, Purpose and Need Statement, alternative presentation, technical/data presentation, and mitigations. Recommendations will be made throughout this letter and then summarized at the end.

The document was presented in an understandable and straightforward manner. The public was presented with information regarding the alternatives reviewed and rejected and the impacts of each alternative. The document only discussed one rejected alternative, which was rejected because the alternative caused the wilderness areas to be highly fragmented and there was little support for the alternative at public meetings. I do agree with the reasons for rejecting the alternative because the concepts of the rejected alternative are included in the preferred alternative. I feel that sufficient information was presented in the document to make an informed decision regarding if the area should be designated as wilderness. As a wilderness designation this is not a technical document and thus there is little technical information in the document. The document focuses on the designation of wilderness areas, not the management of the park if designated wilderness. Clearly, after review, there was public involvement in the development of the document.

The DEIS does appear to follow suggested NEPA formats. The Table of Contents follows the proper format and presentation of material in the document. There are four alternatives presented in the document:

- Alternative A No Wilderness - No Action Alternative
- Alternative B - Maximize Wilderness (94% proposed wilderness)

- Alternative C - Preferred Alternative and Environmentally Preferred alternative (80% proposed wilderness)
- Alternative D - Limit Wilderness to Remote Areas (55% proposed wilderness)

NEPA calls for the No Action alternative, which is present in this document. The list of preparers is identified. All of the preparers serve with the National Park Service, perhaps preparers should be chosen from various agencies, as this will not give bias to the study. For instance, a developer from the planning department should be brought into the study so an opinion on development of the islands can be addressed (i.e. what are the benefits of designating the islands as wilderness, versus development). The general reading is easy to follow and the document conforms to a logical manner. A glossary is provided in the appendices, giving the public a way to look up unfamiliar vocabulary in the document. Another useful section to include may be a list of acronyms. Many acronyms are unfamiliar and including this list will give the public a convenient place to look them up.

Both tables and figures are utilized in the document in key places. There is a good use of highlighted figures that clearly display definitions and pertinent points of the document. The tables are helpful in summarizing each alternative and components of the alternative (i.e. costs, environmental aspects). Tables presented in the main body of the document were not complex and were easy to understand. Listing the benefits and impacts of each alternative in one spot enables the reader to learn about the alternatives without having to read multiple pages. The maps used in the document were interesting and easy to understand. Separate maps were created, illustrating the alternatives examined for wilderness designation. Thus far, information is rather scant in the appendices. The headings of the appendices suggest that more information will be incorporated into the document at a later date. Further information regarding plant and animal species present in the wilderness area will be helpful.

The purpose and need statement is well written and clearly defines the necessity of the project. The fact that the document evaluates only which areas should be made into wilderness areas and not how these areas will be administered is made clear in the Purpose of the document. The Need Statement is clear as well. All lands within the National Park Service must be evaluated for inclusion within the national wilderness preservation system. Sections of the Apostle Islands have been logged and mined, quarries are present and fishing occurs in surrounding areas.

1. These activities should discount the Apostle Islands as a wilderness area. However, according to the Eastern Wilderness Act, these smaller areas can still be considered as wilderness. This is an important point to clarify. Will logging or quarrying to any extent take place on areas determined not to be wilderness, or will all of these activities be stopped if any parts of the Islands are determined to be wilderness? The document is not clear on whether or not these activities still take place on the Islands.

Responses to Celeste Peltier

1. Although logging and quarrying took place in the past, they have not occurred on the Apostle Islands for many years. Resuming these commercial activities would not be consistent with the purposes of the park or the park's current General Management Plan, and would not be permitted to resume on any of the islands regardless of whether or not wilderness is designated in the park.

2. Conflicts in defining wilderness areas are present in the Purpose and Need section of the document. A wilderness is defined as:
 

“...an area of undeveloped Federal land...without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected *primarily* by the forces of nature, with the imprint of man's work *substantially* unnoticeable; (2) has outstanding opportunities for solitude *or* a primitive and unconfined type of recreation; (3) has at least 5,000 acres of land *or* is of sufficient size as to make practicable its preservation and use in an unimpaired condition....”

Underneath this statement is another statement stating that wilderness does not have to be pristine, nor greater than 5,000 acres, and those areas previously altered can qualify as wilderness. The document should state which definition will be followed. This will create a stronger document. If the first definition of a wilderness is followed, then the Apostle Islands are not a wilderness and thus cannot be designated as a wilderness area.
3. Four alternatives are evaluated in the document and the rejected alternative is mentioned, along with reasons for rejection. Alternatives were developed through public involvement and sufficient information is given for each alternative. The alternatives are listed and the preferred alternative is listed as such. If other “rejected” alternatives were discussed during scoping and they are not present in the document, then these alternatives should be included in the alternative section of this document. Including these alternatives will enable the reader to better understand how the present alternatives were reached and why they are “better” alternatives to consider. I do agree with the preferred alternative selected in this study. The alternative attempts to balance human recreational use of the park and preserve pristine areas of the park. The alternative section of the document is clear in defining the criteria used to rank the alternatives. Section 101 of the National Environmental Policy Act was used to determine the preferred alternative, but little support is given as to why the alternative was chosen as the preferred alternative. More support should be given in this section.
 

The effects of the alternatives were covered in great detail, historic, cultural, Native American, and environmental resources are discussed. The document covers the concerns many citizens had about loss of various uses of the island. Concerns were raised about hiking and boating in the area, should the Islands be designated as a wilderness area. As the preferred alternative splits the Islands into wilderness and non-wilderness park areas, how does motorized use of non-wilderness areas affect wilderness areas? For instance, oil slicks from boats may wash onto wilderness area beaches and noise from these areas may disturb wildlife in other areas. Visitors will also bring non-native species (i.e. seeds, insects) to the island. These non-native species may have negative impacts on the wilderness areas.
- 4.
- 5.

2. There are not two definitions of wilderness. Referring to the italicized words in the definition, the Wilderness Act provides latitude in designating areas that are not pristine and in designating areas that are smaller than 5,000 acres (so long as the area is practicable to preserve and use). See also response 1 to the Izaak Walton League and response 3 to Citizens Against Apostle Islands Wilderness.
3. There were no alternatives considered but dismissed by the study team other than the one identified on p.44. During the scoping process people proposed that some islands be designated as wilderness and others be excluded as wilderness. These comments were incorporated into the alternatives that were developed by the study team.
4. Comment noted. We believe the discussion on pages 42-43 regarding why alternative C was selected as the environmentally preferred alternative under §101 of the National Environmental Policy Act is sufficient. Please also refer to p.12, which notes that a "Choosing By Advantages" process was used to select the preferred alternative. Alternative C was determined to best meet the four factors listed and had the highest advantage of all the alternatives considered.
5. The use of motorized boats in nonwilderness areas does not affect and has no bearing on the designation of wilderness, which was the purpose of this study. Oil slicks and noise from boats and the spread of non-native plants by visitors would affect the islands whether or not wilderness was designated – these impacts would not be the result of wilderness designation and thus need not be assessed here.

The methodologies used for analyzing impacts are discussed. Tables or figures should be added to this section to ~~make~~ clarify the main points of the section. The section gives a rating of negligible, minor, moderate, or major to each of the alternatives, regarding various impacts.

6. There is not a lot of supporting evidence in this section regarding how the alternative ratings were assigned. More supporting evidence should be given. This section is broad and general, with no supporting specifics. More examples should be given in this section. The use of signs and trails is discussed in this section, proper installation of signs and trails (using BMP's) will reduce effects on natural resources. These points are not discussed in this section and should be.

Mitigations are not discussed in detail in this document, clearly because wilderness designation does not lead to mitigation measures. Mitigation measures would be applied for developments that may be built in the non-wilderness areas. Sites would be surveyed for impacts before developments would be permitted.

In conclusion, the EIS was prepared in an understandable format. There was good use of tables to present and summarize information throughout the document. Helpful maps identifying the project site were used in the body of the document. The information presented to the public was broad and proof of public involvement was provided. The document was thorough in consideration of studies. For instance how the non-wilderness areas will affect the wilderness areas. The document expresses that a balance between human recreation and wilderness designation was considered in alternative development and choice of the preferred alternative. This is important, as the public will be more inclined to agree with the wilderness designation of the Apostle Islands.

Thank you for providing me with the opportunity to comment on the DEIS. I hope my recommendations will be taken into consideration.

Good luck with the completion of the project!

Sincerely,

Celeste M Peltier

6. As noted on p.70, the impact analysis was based primarily on information provided by experts in the National Park Service, and on park staff insights and professional judgments. Also as noted on pages 68-69, the analysis is general and qualitative because it is highly uncertain what development(s) might be built where, and to speculate about other management implications of wilderness and nonwilderness is not appropriate. Examples of potential developments in nonwilderness areas were identified on p.68 and generally assessed in the chapter. Given the uncertainty of what might be built, mitigation measures were not identified in this study, which is primarily focused on the impacts of wilderness designation and not on the installation of signs and trails. As stated on p.73, it was assumed in this analysis that appropriate mitigation measures would be applied for developments that may be applied in the nonwilderness areas. Specific mitigation measures, such as best management practices for the installation of signs and trails, are more appropriately addressed in a project design document and the accompanying environmental document.

Sheree L. Peterson  
8 S. 7th St., Box 8  
Bayfield, WI 54814

October 10, 2003

Wilderness Study Coordinator  
Apostle Islands National Lakeshore  
Route 1, Box 4  
Bayfield, WI 54814

Dear Wilderness Study Coordinator:

I submit the following comments regarding the Apostle Islands National Lakeshore Draft Wilderness Study/Environmental Impact Statement.

I have worked in the tourism industry in the Lake Superior region for 27 years, and have lived in Bayfield, Wisconsin for 25 years. I worked as a seasonal employee for the Apostle Islands National Lakeshore for 4 years, and was employed at Isle Royale National Park for 2 seasons. I have worked directly, in a variety of capacities, with visitors to the Apostle Islands region. I have spent over 20 years studying Bayfield and Apostle Islands region history, and have spent hundreds of volunteer hours working to preserve area history by serving on the boards of the Bayfield Heritage Association, Inc. and the Bayfield County Historical Society. I have also worked at the Madeline Island Historical Museum.

I am very concerned about the status and preservation of cultural resources as impacted by wilderness designation in the Apostle Islands National Lakeshore. Early in the establishment of the Apostle Islands National Lakeshore, NPS representatives met with local historical organizations to do general planning, so that each group could focus on preserving and interpreting particular themes and areas of history and not overlap efforts. I hope that establishment of wilderness areas in the Apostle Islands National Lakeshore does not lead the National Park Service to fail in its commitment to preserve island history. The residents of the area have graciously shared their knowledge, archival materials and artifacts relating to Apostle Islands history, trusting that the federal government will preserve this important story.

1. It is important to be objective as to whether any areas in the Apostle Islands National Lakeshore qualify under the definition of wilderness under the Wilderness Act. Because of the extensive human use and activities that have occurred on the islands since prehistoric times, any qualification needs to be based upon the Eastern Wilderness Act. However, I contend that because the significance and story of the Apostle Islands is so completely based on both natural and human history, that only a small percentage of the Lakeshore should receive wilderness status. This portion should consist of the more remote islands (such as North Twin Island), where less human activity has taken place and left its mark. I believe the intermixing of wilderness and non-wilderness areas within and among the land masses in the Lakeshore, surrounded by waters that are non-wilderness should be avoided and does not contribute to the essence of wilderness.

#### Responses to Sheree Peterson

1. Your proposal was addressed in alternative D, which limited wilderness to remote areas in the park. We do not believe the NPS preferred alternative would result in an intermixing of wilderness and nonwilderness areas, surrounded by waters that are nonwilderness, nor detract from "the essence of wilderness." In fact, most of the islands would be managed as wilderness, as they have been, under the NPS preferred alternative so there would be little intermixture of wilderness and nonwilderness when one is on the islands. Although it is true that the islands would be surrounded by nonwilderness waters, most visitors' wilderness experiences in the interiors of the islands would not be degraded by activities on the waters. It is also worth pointing out that other designated wilderness areas are surrounded by nonwilderness waters, such as at Isle Royale National Park, Cumberland Island National Seashore, Gulf Islands National Seashore, and Fire Island National Seashore.



Two of the most troubling aspects of wilderness designation, to me, are the prohibition of interpretive signs and restrictions of future trail establishment in wilderness areas. I see these things as limiting visitor accessibility and understanding of the significance of the Apostle Islands National Lakeshore. Apostle Islands visitors for the most part, are thoughtful and responsible, and very open to educational opportunities. Interpretive signage is an important method of telling the natural and human history of the Apostle Islands. I believe that the door should remain open to the possible establishment of a few more trails on the islands. Wilderness status closes that door.

It has been said that the NPS preferred wilderness alternative would allow the Apostle Islands National Lakeshore to continue to be managed as it has been so far. Many positive things have been accomplished by NPS, such as archaeological studies, biological studies and inventories, historical and engineering studies and stabilization of lighthouses, protection of fragile vegetation and rare species, development of docks, trails and campsites. However, there has always been more that should be done to survey and document the resources so that management plans can be made to best preserve the significant features of the Lakeshore and provide the public the opportunity to experience and understand the significance of the Apostle Islands archipelago. Sadly, we have lost some historical sites on the islands due to inaction. The Herring King Cottage on Sand Island, its roof built from the inverted hull of a damaged boat, has decayed beyond preservation. And the historic buildings of Trollers' Home resort on South Twin Island were inappropriately torn down two decades ago by the National Park Service.

2. 

After inquiring, I have been told by both a representative of the Wisconsin Historical Society and the National Park Service, that the Wisconsin Historical Society was asked to comment on the wilderness establishment, taking into consideration its impact on only Apostle Island historical sites listed on the National Register of Places. It is very inappropriate not to consider all cultural resource sites on the islands, as they should be part of an objective study of any wilderness proposal. In addition, some sites have potential for National Register listing. Their inclusion in wilderness areas would undoubtedly deter forever the funding for their research, nomination and preservation. Since a historical resource survey of the Apostle Islands National Lakeshore has not yet been completed (and contracting out for this survey was begun just this past summer), I cannot imagine how an informed, objective decision regarding wilderness status can be made without this vital piece of the puzzle.

From talking with area residents and reading several letters to editors of local newspapers, it seems that the public is misinformed about the wilderness study, and that some groups and individuals have responded to overly simplified versions of the issues that need to be considered. I have heard some voice their understanding that "wilderness status is the only way to prevent over-development on the islands." Since the Apostle Islands National Lakeshore was created and set aside as a national park area to prevent this from ever happening, and park management plans have never come remotely close to calling for resorts to be established on the islands, this is a mute point. The natural environment and the peace and solitude of the Apostle Islands are quite well-protected without wilderness status. Some who have supported the NPS preferred alternative are under the mistaken understanding that all cultural resources are excluded from the proposed wilderness areas, which is

2. Under both policy and statute, the National Park Service protects and preserves sites either listed in or eligible to be listed in the National Register of Historic Places, whether or not the site is in wilderness. Wilderness designation does not affect our ability to conduct research to determine if a site is eligible for listing. Likewise, if a site in wilderness has potential for national register listing it does not affect funding for research on its eligibility, on the nomination process, or on its preservation. It should be stressed that no decisions affecting the future of cultural resources on the islands, whether the resources are in wilderness or elsewhere in the park, will be made until a determination has been made on their eligibility for listing on the national register. If the resources are eligible, no decision will be made until consultations with the state historical preservation office and with affiliated tribes, if appropriate, have been completed.

Regarding the lack of information you noted, it is true that a historical resource survey has not been completed for the park. However, our decision on the selection of a wilderness proposal was based on best available information on hand, and we did not feel the lack of specific historical resource data was a critical factor in making a decision.



definitely not the case. And finally, it is unfortunate that many wilderness supporters from outside the area have been caught up in a “wilderness for wilderness sake” frenzy, with no knowledge of the cultural resource trade-offs involved in wilderness establishment in the Apostle Islands. The natural and cultural resources of the Apostle Islands National Lakeshore are important treasures that belong to all Americans. We should not sacrifice one for the other.

Most unfortunately for the Apostle Islands National Lakeshore, National Park Service employees come and go with the wind. Most employees spend only a few years at this park, just beginning to understand it before they move on to another park. It is difficult to absorb knowledge and understanding of the islands here in a short time, due to the challenges of seasonal travel on Lake Superior and the vastness of the resource. The preservation of resources is very much tied to people who are familiar with and understand the resource. By designating much of the Lakeshore as wilderness per the NPS preferred alternative, future budgeting for cultural resource research and projects could easily diminish as employees come and go in the park. For many people in the Lake Superior region, the memory of the poor manner in which historic structures were destroyed by the National Park Service on Isle Royale because of wilderness designation, is quite vivid.

I hope that those who have commented on the Apostle Islands wilderness study have: 1) actually read the study, 2) realize that the Apostle Islands archipelago is rich in both cultural resources and natural features, and that these areas overlap and are not readily divisible, 3) have objectively weighed the costs to cultural resources, and the restrictions to interpretation and education about both natural and cultural resources that would be caused by the NPS preferred wilderness alternative.

I suggest that less land area than that suggested in the National Park Service’s preferred alternative should be granted wilderness status. Specifically, I think that Oak and Stockton islands should be non-wilderness areas.

Because of Oak Island’s location adjacent to the mainland in the inner tier of islands, it is one of the more accessible islands for the general public and offers a wonderful opportunity for visitors to learn about its natural and cultural history. Because it is subject to more nearby marine activity than more distant islands, the qualities that define wilderness are not sufficiently present on the island in order to qualify it for wilderness status. And most importantly, Oak offers a rich cultural history that should be part of the visitor’s experience. Historical highlights include archaeological sites, a Native American sugar bush, a circa 1850 steamboat wood yard and dock (probably the first such wood yard in the region), the mid-19th century homestead of the Benjamin Armstrong family (significant figures in area and especially Anishinabeg history), and home of hermit Martin Kane whose adventures and exploits are typical of the unique, significant human history of the Apostle Islands region. In combination with interesting topography, flora and fauna, a sandspit, and wonderful hiking opportunities, Oak Island should be managed for the public’s best interest as non-wilderness. A well-planned system of interpretive signage is very appropriate on this island.

I also suggest that Stockton Island should remain entirely non-wilderness, for much the same reasons as Oak Island. Although it is further from the mainland, it is very accessible. The NPS preferred designation of partial wilderness designation on Stockton Island contributes to a fragmented management plan.

I think it is unfortunate that the comment period for the wilderness study coincided with the region’s busy tourism season. Many tourism-related business owners and employees whose industry may be affected by future decisions about the Apostle Islands National Lakeshore made from this study and who may have important input, have been working long hours during a busy season. Reading an extensive document and attending public meetings during the peak tourism season has not been possible for many of these people.

Thank you for the opportunity to comment on the wilderness study.

Sincerely,

*Sheree L. Peterson*  
Sheree L. Peterson

3. Although we agree that the preservation of resources is tied to people who are familiar with and understand the resource, we disagree that wilderness designation will affect future budgeting for cultural resource research. The two topics are not connected – the movement of park employees and changes in cultural resource funding will occur independently of whether or not wilderness is designated in the park.

4. Oak Island was included in nonwilderness in alternative D. We agree that Oak Island has wonderful interpretive opportunities, but the island also clearly meets the criteria for wilderness designation. Nearby motorboat activity (or any activity for that matter) outside the proposed wilderness cannot be considered as a factor in determining whether or not to include any of the islands in our wilderness proposal. We do not believe that interpretive signs are needed on Oak Island in order to help visitors better understand the human and natural history of the park. Other interpretive techniques can be used on this island, such as brochures. We believe that signs and other interpretive facilities, if needed, can be limited to 20% of the park excluded from wilderness in alternative C – interpretive facilities on Sand and Basswood Islands and portions of Rocky and Stockton Islands would be sufficient to interpret most of the Apostle Islands’ primary cultural and natural resources and satisfy most visitors’ interpretive needs.

We agree that part of Stockton Island should remain as nonwilderness due to concentrations of visitors, employees, and facilities. But most of the island gets very little use and clearly meets the criteria for wilderness designation. Most interpretation can occur in the existing developed areas. There is no need for additional interpretive facilities outside these areas. We disagree that the wilderness proposal would result in fragmented management. The boundary separating the wilderness area and the nonwilderness area (Quarry Bay and the Presque Isle area) would be clearly identifiable on the ground to both visitors and managers and is not expected to lead to a major change in the management of resources or visitors from what currently occurs on Stockton Island.

Apostle Islands National Lakeshore  
Attn: Wilderness Study  
Route 1 – Box 4  
Bayfield, WI 54814

Wilderness Study Coordinator

I have received and appreciatively reviewed the Draft WS/EIS. I would like to register my support for the preferred alternative, ALT. C, with a few minor caveats.

First, let me note that I have been involved with wilderness area reviews for over 20 years, primarily through conservation organizations such as the Wilderness Society and Oregon Natural Resources Council. I submitted extensive comments under the RARE II process and am familiar with both the restrictions of the Wilderness Act and with the mandates for National Parks. I support Wilderness designations where it is appropriate, but not across the board. Also, although now an Oregonian, I was born and raised in Wisconsin, and I have had the benefit of an extensive discussion with Superintendent Krumenaker regarding Park biology, history, and management philosophy.

National Parks are under a special mandate to preserve natural resources, provide recreational opportunities, and to protect wildlife. The Wilderness Act focuses primarily on protection of areas unimpacted by significant human activities and with opportunities for solitude. There is both overlap and conflict with these goals and I think Alternative C strikes the correct balance by providing wilderness protection for the largest and most contiguous areas while maintaining the flexibility for the administration of the Apostle Islands to manage for its human use potential.

A couple specific points:

- 179
1.

2.

3.

4.
- 1) It makes general sense to avoid fragmentation and choppy boundaries of wilderness areas, hence the removal of the peninsula on Stockton Is. and the consolidation of use areas on Rocky Is. make sense;

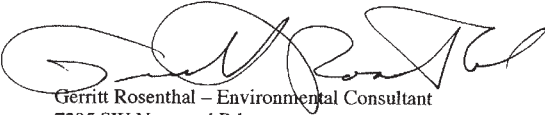
2) Alternative C (text) indicates that Eagle Island is included in the wilderness proposal, yet the map for Alt. C shows it excluded – this should be corrected [and it should be included as wilderness];

3) I would wonder if there is not some contiguous portion of Sand Is. that could be retained as wilderness particularly to protect specific habitat items, but am not familiar with the specific historical settlement patterns [a similar comment could be made for Basswood Is.];

4) Deer Island is removed from Wilderness designation on Alt. C, however, there is no discussion of the reasons for this change and why it makes sense. When removing a single large entity from the recommendation, a more complete explanation should be offered; and

5) It is unfortunate that some portion of the underwater environment could not also be designated as either wilderness area or research natural area – this may be due to lack of legal authority and should be explained; at a minimum, the EIS should identify areas that should be managed to protect pristine underwater conditions.

I appreciate the opportunity to comment on the plan.



Gerritt Rosenthal – Environmental Consultant  
7205 SW Norwood Rd.  
Tualatin, OR 97062

Responses to Gerritt Rosenthal

1. This mistake was corrected in the final document. Eagle Island is now shown as being included in the alternative C wilderness proposal.
2. We believe that Sand Island's important habitat areas can be protected through management zoning and other administrative actions, and that wilderness designation is not required to protect these areas. See also response 2 to PEER.
3. There is no Deer Island in Apostle Islands National Lakeshore. (If you are referring to Long Island, see response 3 to PEER.)
4. The reasons why the waters of Lake Superior and submerged lands within the park boundary were not considered for wilderness were described on p.26. The questions of managing these underwater areas to protect "pristine underwater conditions," and whether or not to designate a research natural area are beyond the scope of this study. It should be noted, however, that the current General Management Plan calls for efforts to maintain the "highest water-quality standards" in the park.

August 5, 2003

Wilderness Study Coordinator  
Apostle Islands National Lakeshore  
Route 1, Box 4  
Bayfield WI 54814

Dear Wilderness Study Coordinator:

Please accept this letter with my comments on the National Park Service's Wilderness Study and accompanying Draft Environmental Impact Statement (DEIS) for Apostle Islands National Lakeshore.

By way of brief background, until about two years ago, I was a northern Wisconsin (Ashland) resident for about a decade. I had several jobs during this time, including Bayfield County Zoning Administrator and Watershed Project Director for the Wisconsin Chapter of The Nature Conservancy. I became familiar with the Apostle Islands, and I developed a deep love and appreciation for them. Although I am no longer a Wisconsin resident, I maintain many friends and other ties to Wisconsin, and I still own 120 acres near Glidden in Ashland County.

After reviewing the relevant information on the APIS web site, I wish to support and urge the National Park Service to adopt Alternative B. As you know, this alternative reflects the past interim NPS management of 94 percent of the lakeshore's land base as de facto wilderness. This is the status quo of management that the vast majority of previous public comments supported. As described in the DEIS, implementation of this alternative will not impact existing lakeshore facilities or public uses. The previous concerns about motorized boat access to the islands have been resolved and Alternative B would not hinder this access.

I am frankly disappointed that the NPS preferred and environmentally preferred alternative is not Alternative B, and that it would not maintain this status quo. It would instead allow some additional areas to be available for new facilities and uses. I believe that all of these possible future facility upgrades and/or new or expanded public uses can and should be accommodated on the six percent of the lakeshore's land base that would remain non-wilderness until Alternative B. There is no compelling rationale given for why more non-wilderness lands must be "reserved" beyond those currently available. As noted in the DEIS, the Wisconsin Legislature intended that the conveyed lands be managed to protect wilderness characteristics. And there is sufficient room at and around existing facilities to provide for any future upgrades or expansions.

In addition, the overall trend for the National Park Service is to try to locate any new visitor facilities in "gateway" communities adjacent to or near park boundaries wherever possible. This protects park lands and resources while helping local communities. It provides the most efficiency in terms of reduced energy, transportation, and service costs,

#### Responses to Richard Spotts

1. Please see responses 2 and 4 to PEER, response 2 to the National Parks Conservation Association, response 2 to Friends of the Boundary Waters Wilderness, responses 1 and 4 to Brandt Mannchen, and response 1 to Harold Jordahl. With regard to your point that there is sufficient room at and around existing facilities to provide for future upgrades or expansions, we cannot speculate in this study whether there is or is not sufficient room for new developments. If a decision were made to build a new development(s) on the islands, we would likely try to locate that new development(s) in an area with existing facilities. But in some cases, such as interpretive facilities, a facility may need to be built in other areas. By not including several areas in wilderness, we would retain the flexibility to locate a new facility in the best suitable location both from a resource protection and visitor use perspective.

and most directly benefits the local citizens and economies of these communities. In this case, any new facilities can and should be located on acquired or leased private land in Bayfield, Red Cliff, and/or Port Wing. These locations would be the most convenient and efficient, least environmentally damaging, and attract the most visitors. In contrast, locating new facilities out on any of the islands, or along the pristine NPS-administered north shore, would cause much more significant adverse environmental impacts and energy inefficiencies, with comparatively smaller public benefits.

2. I was also disappointed to learn that Long Island was not included for wilderness protection in the NPS preferred alternative. The federally listed Least Terns have nested there in the past, but the trend toward more intensive recreation (including the presence of some dogs running on the beach) has scared them off. There are abundant dune and beach areas available for more intensive public recreation elsewhere. Long Island should be managed and protected as wilderness to restore its primitive character and perhaps entice nesting Least Terns to return.

While most wilderness issues are very contentious, especially where I now live in Utah, Wisconsin residents and the National Park Service are truly fortunate that there is such an overwhelming and strong public consensus in favor of maintaining the wild and natural "status quo" at the Apostle Islands. Please do not short-change this consensus and fumble this tremendous, positive opportunity for wilderness protection. Please adopt and work to implement Alternative B.

Thank you very much for your consideration.

Sincerely,



Richard Spotts  
1125 W. Emerald Drive  
St. George UT 84770-6026  
[spotts@infowest.com](mailto:spotts@infowest.com)

Note: In a subsequent e-mail, dated August 7, 2003, Mr. Spotts stated that had erroneously had referred to least terns in his August 5<sup>th</sup> letter and requested that the text be corrected to refer to piping plovers in the 3<sup>rd</sup> paragraph from the bottom.

2. Please see response 3 to PEER, response 8 to Friends of the Boundary Waters Wilderness, and response 9 to Brandt Mannchen.



"swainaa"  
<swainaa@msn.com>  
10/06/2003 03:08 PM  
CST

To: <Apis\_comments@nps.gov>  
cc:  
Subject: Wilderness Study

Wilderness Study Comments:

1. After reviewing the Draft Wilderness Study/Environmental Impact Statement, I recommend Alternative C with a couple of modifications. As a researcher who has done many studies over several decades that include fire history, tree reproduction, stump analysis, and several paleoecological analyses from island bogs, I recommend giving the large bog at the north end of the Stockton Island tombolo and most of Basswood Island outside of the camping area wilderness status. The bog on Stockton Island is still in pristine condition and was the site of one of my pollen studies. Basswood Island has some excellent hardwood forests with hemlock that is reproducing. Feel free to contact me if you have any questions regarding my comments.

Sincerely,  
Albert M. Swain

Phone: 608-437-1963  
104 Mayflower Circle  
Blue Mounds WI 53517  
e-mail: swainaa@msn.com

Response to Albert Swain

1. Although we agree that the bog on Stockton Island should be protected, we believe this can be done administratively and that wilderness designation is not necessary to provide further protection. This wetland would be protected under NPS policies whether or not it was designated as wilderness. See also response 6 to Friends of the Boundary Waters Wilderness.

With regard to the Basswood Island forests, we also agree that these forests should be protected, but this can be done without wilderness designation. There are other justifiable reasons why we believe this island should not be wilderness. See response 1 to the National Parks Conservation Association and response 2 to PEER.

10/16/03

Jim Nepstad  
Wilderness Study Coordinator  
Apostle Islands National Lakeshore  
Route 1, Box 4  
Bayfield WI 54814

Mr Nepstad,

**PRESERVATION.** The goal for an AINL management plan should be to manage the park in a manner that preserves the uniqueness of the resource for future generations.

**UNIQUENESS.** The AINL is a unique part of the national park system. While clearly representing a pristine wilderness environment, it also has multiple historical significance as a Native American settlement, early water transportation route, and European immigration and settlement in North America. Any management regimen must function on all these levels to succeed.

**SUSTAINABILITY.** Alternative B best balances all the needs at present. However, it may not fully anticipate the impact of increased use of the Lakeshore in the future, and the consequent challenge to its sustainability. The following suggestions regarding access and soundscape management address some of the sustainability issues before us.

1. **ACCESS.** In the future, the current wilderness experience may be challenged by overuse due to unprecedented access made possible by inevitable technological progress. To this end, modifying Alternative B to allow only non-motorized vessels access to designated islands (i.e., Bear, Cat, Ironwood, Otter) would protect an additional level of experience for the non-motorized patron, a significant and growing constituent of the Lakeshore. This level of access is not without precedent, as access to North Twin, Eagle, and Gull islands is currently restricted to an even greater degree and for the most part is self-enforcing.
2. **SOUNDSCAPE.** Thinking beyond the plan, the protection of the soundscape may be addressed by managing sources of noise pollution. Developing solutions in conjunction with other governmental agencies for managing the airspace above the Lakeshore as well as designating appropriate no-fly zones (similar to management of water areas for fish habitat) would contribute to maintaining a wilderness soundscape. In addition, an appropriate noise/speed/no-wake zone ordinance for boats, as is customary on most bodies of water, provides guidance to the responsible patron and a framework for management as needed. Also, group size can influence noise levels and could be managed via the existing camping permitting process.

Based on the request of the commenter, the name and address of this person has been withheld

1. This is not a reasonable or feasible modification for alternative B. We do not believe that closing the four islands you cited to motorboat use would protect or enhance the experience for nonmotorized users: people would still hear and see motorboats in the waters surrounding these islands. Most people who visit the islands arrive by motorboat. Your suggestion would discriminate against these users, preventing them from using four islands that have a long history of this use. In addition, even if we were to adopt this suggestion it would not be feasible to enforce the closure given the lack of a discernable boundary on the lake, the large number of motorboats in the area, and limited park staff and resources. (Gull and Eagle Islands are closed seasonally to all public access by superintendent order for the protection of sensitive nesting birds. This does not apply to the four islands you cited.)
2. The protection of the park's soundscape, including the designation of no-fly zones, noise/speed/no-wake zones, and group size restrictions, is beyond the scope of this wilderness study. If such actions were needed, they would be more appropriately addressed in a subsequent management plan and accompanying environmental document, with opportunities for public participation in the decision.



Wilderness Study Coordinator  
Apostle Islands National Lakeshore  
Route 1, Box 4  
Bayfield, WI 54891

Dear NPS Decision-makers:

I am writing to you today to urge you in the strongest way I can, to please act now to protect the amazing Apostle Islands National Lakeshore as designated wilderness.

I ask you to implement a modified Alternative C, which designates most of the islands in the park as formal Wilderness Areas.

The changes I ask the NPS to implement to Alternative C, involve specifically the decision to designate Basswood Island as wilderness (but with the exception of the dock on the west side of the island and a quarry on the southern tip of the island), and the four items also listed below. With

- 184
1. regards to the Basswood Island designation, designation with these exclusions is consistent with a myriad of other areas throughout the park that historically have not been managed as wilderness, including, but not limited to, waterways; all public docks on the islands; and major cultural sites such as the six light stations and numerous historic residences and structures. There is no rational reason to exclude the entire Basswood Island wilderness from designation.

In addition, I also write to urge the NPS to:

2. \* Make its final decision regarding wilderness designation based on the Apostle Islands National Lakeshore's suitability for wilderness - not based on politics or NPS plans for future development (if any).
3. \* Take the appropriate measures to protect the biologically-important sand bridge, or tombolo, that now connects Presque Isle to Stockton Island. While Presque Island should not be included in the wilderness designation given its large number of administrative buildings, I am concerned about the tombolo and its need for protection, as it is highly sensitive to trampling.
4. \* Address ways in which the NPS will protect the resident bear population from the encroachment of humans on both Stockton Island and Sand Island.

#### Responses to Bryan Wyberg

1. While we agree that Basswood Island is suitable for wilderness designation, we believe there are other justifiable reasons for not including the island in the NPS wilderness proposal. See response 1 to the National Parks Conservation Association and response 2 to PEER.
2. See responses 3 and 4 to Friends of the Boundary Waters Wilderness and response 2 to PEER.
3. See response 6 to Friends of the Boundary Waters Wilderness.
4. See response 7 to Friends of the Boundary Waters Wilderness.

5. \* Ensure the continuing protection of the more than 100 bird species using the Apostle Islands as an important migratory flyway stop-over in the Great Lakes region. Specifically, the piping plover is an endangered species, and Long Island, which would no longer be protected as wilderness in Alternative C, is the only place where plovers nest in Wisconsin. At the minimum, I feel that the final Wilderness Study must include a discussion of how the NPS will comply with its legal responsibility to "not adversely modify or destroy critical habitat" when Long Island changes from de facto wilderness to non-wilderness, should that be the unfortunate final decision on this matter.

I have written to the NPS several times in the course of this wilderness study public involvement process. Each time I write asking for the greatest amount of these treasured islands to be designated as formal wilderness. I love these islands, and I want them preserved for future generations. This also aligns with the intentions of the State of Wisconsin, when it deeded the islands to the federal government to begin with.

The islands of the Apostle Islands National Lakeshore are unique treasures deserving of formal wilderness designation because of their old-growth forests, high hills and steep valleys, and red sandstone bluffs and intricate sea caves. Unchanged in use will be the surrounding waterways (not slated to be designated as wilderness), which provide recreational opportunities for a variety of park users (users of kayaks, motorboats and sailboats).

So again, please select Alternative C, as modified by the above four points and the inclusion of the majority of Basswood Island, as the final position of the Wilderness Study. Future generations of Americans will thank you for maximizing the wilderness protections you afford these natural jewels.

Thank-you,

Bryan Wyberg  
12854 Raven Street NW  
Coon Rapids, MN 55448  
bryan.wyberg@honeywell.com

5. See response 8 to the Friends of the Boundary Waters Wilderness, response 9 to Brandt Mannchen, and response 1 to Emmet Judzewicz.



Oral Comment at the Stockton Public Meeting

Comment : In order to maximize flexibility with respect to docks in the future, the wilderness boundaries should be drawn around all areas where docks have existed historically.

Response to Oral Comment at the Stockton Public Meeting

Response : Adding additional nonwilderness areas to encompass all areas where docks have existed would not be consistent with one of the intents of the preferred alternative, which was to minimize the number of small, fragmented areas of wilderness or nonwilderness. We also believe that the proposed exclusion areas in the preferred alternative include sufficient area for the installation of additional docks, should that be determined to be necessary and feasible in the future. It would also be possible to expand most existing docks if necessary. The development of additional docks or the expansion of existing docks would be considered in a future management plan and accompanying environmental document.

**APPENDIXES / BIBLIOGRAPHY /  
PREPARERS / GLOSSARY / INDEX**

*(Back of Divider Page Blank)*



IN REPLY REFER TO:

## United States Department of the Interior

NATIONAL PARK SERVICE

MIDWEST REGION

1709 JACKSON STREET

OMAHA, NEBRASKA 68102-2571

L48(MWR-PC/C)

APR 26 2001

### Memorandum

To: Director, WASO (0001)  
From: Regional Director, Midwest Region  
Subject: Wilderness Suitability Assessment for Apostle Islands National Lakeshore

The attached memorandum from the Superintendent, Apostle Islands National Lakeshore, proposes that evaluations completed in association with the park's 1989 general management plan be accepted as meeting the requirements for a wilderness suitability assessment as required by section 6.2.1 of National Park Service Management Policies. I agree with the proposal, and recommend that you approve the determination of the identified land as suitable for designation as wilderness.

As you may recall, Senator Russ Feingold added language to the fiscal year 2001 Department of Interior Appropriations Conference Report that earmarked \$200,000 for a formal wilderness study at Apostle Islands. We intend to initiate that study this summer. However, we believe it is important to complete the wilderness suitability assessment process as outlined in Management Policies before proceeding.

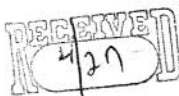
If you concur with our approach, and agree with our determination of suitability, please indicate by signing below. If you have questions about this matter please contact me or Michael Madell, Regional Environmental Coordinator, at 608-441-5600.

Attachments

CONCURRED AND APPROVED

  
\_\_\_\_\_  
Director, National Park Service

04/27/01  
Date





IN REPLY REFER TO:

## United States Department of the Interior

NATIONAL PARK SERVICE  
Apostle Islands National Lakeshore  
Route 1, Box 4  
Bayfield, Wisconsin 54814-9599

April 25, 2001

L48

### Memorandum

To: Regional Director, Midwest Region

From: Superintendent, Apostle Islands National Lakeshore

Subject: Wilderness Suitability Assessment for Apostle Islands National Lakeshore

National Park Service (NPS) Management Policies (2001) require that a "wilderness suitability assessment" be performed prior to initiating a wilderness suitability study for an area. In initiating the park's Wilderness Suitability Study, questions were raised regarding whether that step has already been taken here.

In our professional judgement, we believe that it has. Regional Environmental Coordinator Michael Madell, and NPS Wilderness Program Manager Wes Henry have concurred. The park's 1989 General Management Plan contains a section titled "Wilderness Suitability," which met all of the requirements of NPS Management Policies (1988). It both quantified and delineated lands that park management believed to be suitable for further study as wilderness, and did it as part of a public process. A copy is enclosed for your review. This assessment stated that about 97% of the park's land base had wilderness potential. Given that extremely high percentage, and given that the park has been managing those lands as wilderness with little or no controversy for the past 12 years, we believe that the document's age is not an issue. The conclusions of the assessment are still current today – about 97% of the park's land base remains eligible for further study.

This assessment meets all of the requirements of the Wilderness Act, as well as all of the NPS policies in effect at that time. However, the 2001 Management Policies require approval of the assessment by the Director. We believe that in the interest of completeness, it would be best to seek that approval, thereby meeting all of the current requirements of a wilderness suitability assessment.

Our overriding concern at this point is to be able to hold scoping sessions in the local area this summer. Due to the seasonal nature of both the local and visiting populations here, we believe that summer scoping sessions are critical. If we are not able to wrap up the assessment soon, we risk

losing that opportunity. The only reasonable alternative we will have if that happens is to delay the study for an additional year.

We appreciate your consideration of this matter. If you have any questions about our wilderness suitability assessment, or any other aspect of the wilderness suitability study, please contact either Management Assistant Jim Nepstad at 715-779-3398 extension 102, or me at 779-3398 extension 101.

John D. Neal



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Green Bay ES Field Office  
1015 Challenger Court  
Green Bay, Wisconsin 54311-8331  
Telephone 920/465-7440  
FAX 920/465-7410

November 21, 2002

APOLIS ISLANDS	Info	Action	Initials
Superintendent	/	/	LS
Mgmt Assistant	/	/	JS
Admin Officer	/	/	JS
Chief Res Mgmt	/	/	JS
Chief Res Ed	/	/	JS
Chief Maint	/	/	JS
Julie			

RECEIVED  
APOSTLE ISLANDS NL  
NOV 25 2002

### Memorandum

**To:** Superintendent, Apostle Islands National Lakeshore, National park Service,  
Bayfield, WI

**From:** Field Supervisor, ES Field Office, Fish and Wildlife Service,  
Green Bay, WI

**Subject:** Apostle Islands National Lakeshore Wilderness Suitability Study/Environmental  
Impact Statement, Ashland and Bayfield Counties, Wisconsin

The U.S. Fish and Wildlife Service (Service) has reviewed the referenced project. We offer the following comments relative to potential impacts of the proposal on endangered species.

### Federally-Listed Threatened and Endangered Species and Critical Habitat

A review of information in our files indicates that the following federally-listed threatened or endangered species or critical habitat occur in Ashland and Bayfield Counties.

#### Ashland County

<u>Classification</u>	<u>Common Name</u>	<u>Scientific Name</u>	<u>Habitat</u>
threatened	bald eagle	<u>Haliaeetus</u> <u>leucocephalus</u>	breeding
endangered	gray wolf	<u>Canis lupus</u>	northern and central forested areas
threatened	Canada lynx	<u>Lynx Canadensis</u>	potential habitat
endangered	piping plover	<u>Charadrius</u> <u>melodus</u>	sandy beaches; bare alluvial and dredge spoil islands



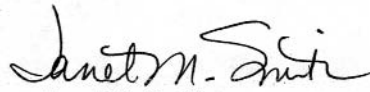
critical habitat	piping plover	<u>Charadrius</u> <u>melodus</u>	sandy beaches that possess all or most of the primary constituent elements
------------------	---------------	-------------------------------------	--

**Bayfield County**

<u>Classification</u>	<u>Common Name</u>	<u>Scientific Name</u>	<u>Habitat</u>
threatened	bald eagle	<u>Haliaeetus</u> <u>leucocephalus</u>	breeding
endangered	gray wolf	<u>Canis lupus</u>	northern and central forested areas
threatened	Canada lynx	<u>Lynx canadensis</u>	potential habitat
threatened	Fassett's locoweed	<u>Oxytropis</u> <u>campestris</u> <u>var. chartacea</u>	open sandy lakeshores

Due to the nature and location of the proposed activities, we conclude that listed species or critical habitat will not be affected. This precludes the need for further action on this project as required by the 1973 Endangered Species Act, as amended. Should the project be modified or new information become available that indicates listed species or critical habitat may be affected, consultation should be initiated.

We appreciate the opportunity to respond. Questions pertaining to these comments can be directed to Mr. Ronald Spry by calling 920-465-7420.

  
 Janet M. Smith



## BIBLIOGRAPHY

- Advisory Council for Historic Preservation (ACHP)  
 2002 "ACHP Policy Statement: Balancing Cultural and Natural Values on Federal Lands." <http://www.achp.gov/achpcultnatpolicy.html>.
- Anderson, R. and L. Stowell  
 1985 "Wildlife Management Plan for Select Habitats and Species of the Apostle Islands National Lakeshore." Prepared for the National Park Service. Contract CX—6000-7-R059. University of Wisconsin, Stevens Point.
- Brander, R., R. Maxwell, and C. Wickman  
 1978 "An Inventory of Selected Natural and Cultural Resources on Eight Islands of the Apostle Islands National Lakeshore." Sigurd Olson Institute Special Report No. 24, Northland College, Ashland, WI.
- Cary, S., P. McDowell, and L. Graumlich  
 1978 "Soils and Surficial Geology of Four Apostle Islands." Paper presented at annual meeting of Wisconsin Academy of Science, Arts, and Letters.
- Casper, G.  
 2001a. "Amphibian Inventory of the Apostle Islands National Lakeshore, with an Evaluation of Malformity Rates, Monitoring Recommendations, and Notes on Reptiles." Prepared for Apostle Islands National Lakeshore. Casper Consulting, Milwaukee, WI.
- 2001b "Reptile Surveys of Long, Michigan, and Stockton Islands, and Little Sand Bay, in the Apostle Islands National Lakeshore, with Notes on Amphibians." Prepared for Apostle Islands National Lakeshore. Casper Consulting, Milwaukee, WI.
- Duffy-Deno, K. T.  
 1998 "The Effect of Federal Wilderness on County Growth in the Intermountain Western United States." *Journal of Regional Science* 38(1):109-136.
- Eisenreich, S.  
 1987 "The Chemical Limnology of Nonpolar Organic Contaminants: Polychlorinated Biphenyls in Lake Superior" In: Sources and Fates of Aquatic Pollutants, Advances in Chemistry Series 216, edited by R.A. Hites, and S.J. Eisenreich. American Chemical Society, Washington, D.C.
- Feldman, J. and R. Mackreth.  
 2003 "Wasteland, Wilderness, or Workplace: Perceiving and Preserving the Apostle Islands." Paper presented at the April 2003 George Wright Conference, San Diego, CA.

- Fleming, K.  
1997 "A Demographic Comparison of a Hunted and an Unhunted Population of Black Bears in Northern Wisconsin." M.S. thesis. University of Wisconsin, Stevens Point, Wisconsin.
- Grossberg, R. A.  
1999 "Changing Landscape Perceptions and the Meaning of Wilderness: Visitors' Beliefs about a National Park." MS thesis. University of Wisconsin, Madison, WI.
- Heberlein, T. A., R.A. Grossberg, and W. Kuentzel  
1999 "Preliminary Results from the 1997 Apostle Islands Boater and Kayaker Survey." Report presented to Apostle Islands National Lakeshore. On file at park headquarters.
- Howk, N. ed.  
2001 *Hiker's Guide to Apostle Islands National Lakeshore*. Eastern National. Fort Washington, PA.
- Jordahl, H.C. Jr.  
1994 *A Unique Collection of Islands, The Influence of History, Politics, Policy, and Planning on the Establishment of the Apostle Islands National Lakeshore*. Univ. of Wisconsin. Madison, WI.
- Judziewicz, E. and R. Koch  
1993 "Flora and vegetation of the Apostle Islands National Lakeshore and Madeline Island, Ashland and Bayfield Counties, Wisconsin." *Michigan Botanist*, vol. 32(2). Ann Arbor, MI.
- Lake Superior Binational Program  
2000 *Lake Superior Lakewide Management Plan*. On file at park headquarters.
- Lake Superior Ecosystem Research Center  
1997 "Lake Superior food web – Apostle Islands." ONRW final report. Lake Superior Ecosystem Research Center, Michigan Technological University, Houghton, Michigan.
- Lorah, P. A.  
2000 "Population Growth, Economic Security, and Cultural Change in Wilderness Counties." USDA Forest Service Proceedings, Wilderness Science in a Time of Change Conference, May 23-27, 1999. RMRS-P-15-Vol-2. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Ogden, Utah.
- McCauley, D., M. Balcer and M. Hage  
1989 "Abundance and Distribution of Forage Fishes in the Apostle Islands National Lakeshore." Report to Apostle Islands National Lakeshore. University of Wisconsin, Superior.

- Meierotto, R.  
1976 "Speciation Among Small Mammals of the Apostle Islands." Report to the National Geographic Society.
- Meyer, M., D. Andersen, K. Warnke, W. Karasov, C. Dykstra, R. Brander, and J. Van Stappen  
1994 "Factors Controlling Great Lakes Bald Eagle Productivity." Report prepared for The Great Lakes Protection Fund, Chicago, IL.
- Minnesota Pollution Control Agency (MPCA)  
1996 "Toxaphene in the Great Lakes." Roseville, MN.
- National Park Service (NPS)  
1988 *The Apostle Islands: A Guide to the Apostle Islands National Lakeshore.* The Official National Park Handbook. NPS Division of Publications, Washington, D.C.  
1989 *General Management Plan / Environmental Assessment.* Apostle Islands National Lakeshore, Wisconsin. Denver Service Center, Denver, CO.  
1993 "Draft Interim Cultural Landscape Management Plan." Unpublished. On file at park headquarters.  
1995 *The Secretary of the Interior's Standards and Guidelines for Treatment of Historic Properties, with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings,* by K.D.
- Weeks and A.E. Grimmer.  
Washington, D.C.  
1998 "Migratory Bird Survey, Apostle Islands National Lakeshore." G. Smith. Bayfield, WI.  
1999 "Resource Management Plan." On file at park headquarters.  
2000a *National Park Service Management Policies 2001.* Washington, D.C.  
2000b "Director's Order #47: Soundscape Preservation and Noise Management." Washington, D.C.  
2001 "2001 Breeding Bird Survey Report, Apostle Islands National Lakeshore." H. McConnel and G. Smith. Bayfield, WI.  
2002 "List of Classified Structures. Apostle Islands National Lakeshore." On file at park headquarters.
- Nuhfer E. and M. Dalles  
1987 *A Guidebook to the Geology of Lake Superior's Apostle Islands National Lakeshore.* W. C. Brown Publishers. Dubuque, IA.
- Power, T. M.  
2000 "The Economics of Wildland Preservation." A report prepared for the Pew Wilderness Center. University of Montana, Missoula, Montana.

- Rudзитis, G. and R. Johnson  
 2000 "The Impact of Wilderness and Other Wildlands on Local Economies and Regional Development Trends." USDA Forest Service Proceedings, Wilderness science in a time of change conference, May 23-27, 1999. RMRS-P-15-Vol-2. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Ogden, Utah.
- Stoffle, Richard W., et al. (Bureau of Applied Research in Anthropology, University of Arizona)  
 2001 "Traditional Ojibway Resources in the Western Great Lakes: An Ethnographic Inventory of the States of Michigan, Minnesota, and Wisconsin." Omaha, NE: Midwest Regional Office, National Park Service, U.S. Department of the Interior.
- Suhr, J.  
 1999 *The Choosing By Advantages Decisionmaking System*. Qurum Books. Westport, CA
- U.S. Department of the Interior, North Central Field Committee  
 1965 *Proposed Apostle Islands National Lakeshore, Bayfield and Ashland Counties, Wisconsin*.
- U.S. Geological Survey (USGS)  
 1988 Water Resources of the Apostle Islands National Lakeshore, Northern Wisconsin." W. Rose. Madison, WI.

## PREPARERS AND CONTRIBUTORS

### CORE TEAM

Nancy Baker, Project Manager, Denver Service Center. B.A. and M.L.A. Twenty-four years with the National Park Service. Responsible for project budget and schedule.

Tami DeGrosky, Facility Manager, Apostle Islands National Lakeshore. A.A. (Liberal Arts), A.A. (Heavy Equipment Operation), B.S. (Resource Management). Twenty-two years with the National Park Service. Responsible for writing sections on parkwide operations in the document.

Neil Howk, Assistant Chief, Interpretation and Education, Apostle Islands National Lakeshore. B.S. (Natural Resources). Nineteen years with the National Park Service. Responsible for writing portions of “Visitor Experiences Not Related to Wilderness Characteristics” in the “Affected Environment” chapter and “Impact Analysis” section.

Sue Jennings, Environmental Protection Specialist, Midwest Region. BSF (Bachelor of Science, Forestry). Fifteen years with the National Park Service. Responsible for liaison between the study team and the Midwest Regional Office. Provided input in all parts of the document, including development of the alternatives.

Bob Krumenaker, Superintendent, Apostle Islands National Lakeshore. Sc. B. (Bachelor of Science), M.F.S. (Master of Forest Science). Twenty-one years with the National Park Service. Responsible for providing overall management and oversight for all aspects of the study.

Bob Mackreth, Cultural Resource Management Specialist, Apostle Islands National Lakeshore. Twenty-six years with the National Park Service. Responsible for writing on cultural resources in the “Affected Environment” and “Environmental Consequences” chapters, including compliance with §106 of the National Historic Preservation Act. Maintained the park’s web site.

Mary McVeigh, Community Planner, Denver Service Center. BA in Technical Communications. Fifteen years in planning with the National Park Service. Participated in developing the alternatives and facilitated the selection of the preferred alternative

Jim Nepstad, Chief of Planning and Resource Management, Apostle Islands National Lakeshore. B.S. (Mathematics). Seventeen years with the National Park Service. Responsible for coordinating the activities of park staff involved with the project, and for coordinating public involvement activities. Analyzed public comments. Prepared the description of wilderness resources in the “Affected Environment” chapter and the assessment of impacts on wilderness resources. Maintained the administrative record.

Michael Rees, Natural Resource Specialist, Denver Service Center. B.A. (Environmental Studies) and M.F.S (Master of Forest Science). Twelve years with the National Park Service and 8 years with the U.S. Fish and Wildlife Service. Job captain for the wilderness study. Oversaw all phases of the study. Provided guidance to team members on the wilderness study and prepared the “Purpose and Need” and “Alternatives” chapters. Analyzed public

comments. Coordinated the development and production of the document.

Julie Van Stappen, Supervisory Natural Resource Specialist, Apostle Islands National Lakeshore. B.S. (Geology), M.S. (Natural Resources). Twenty years with the National Park Service. Responsible for writing sections on natural resources in the “Affected Environment” and “Environmental Consequences” chapters. Conducted informal consultation with the U.S. Fish and Wildlife Service.

#### **PUBLICATIONS SPECIALISTS**

Linda Ray, Visual Information Specialist  
Sandy Schuster, Editor  
Joan Huff, Information Technology Specialist

#### **TECHNICAL EXPERTS/CONSULTANTS/OTHER CONTRIBUTORS**

##### **Apostle Islands National Lakeshore**

Clay Alderson, Former Acting Superintendent

Myra Dec, Chief of Interpretation and Education

Jeff Hepner, Supervisory Protection Ranger

Damon Panek, Cultural Educator

Jeff Rennicke, Seasonal Interpreter

Greg Zeman, Chief of Protection

##### **Denver Service Center**

Greg Cody, Cultural Resource Technical Specialist

Dave Kreger, Natural Resource Technical Specialist

Nat Kuykendall, Chief of Planning

##### **Midwest Region**

Sandra Washington, Chief, Planning and Compliance

Nicholas Chevance, Regional Environmental Coordinator

Mike Madell, former Regional Environmental Coordinator

Jeff Maxted, Graduate Assistant, Midwest Region GIS Technical Support Center

##### **Other Contributors**

Rich Lichtkoppler, Resource Economist, Bureau of Reclamation

Claudia Rector, volunteer

## GLOSSARY

**Barrier spit** – Elongate sand ridges that extend generally parallel to the coast.

**Cultural landscape** – A geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person, or exhibiting other cultural or esthetic values. There are four nonmutually exclusive types of cultural landscapes: historic sites, historic designed landscapes, historic vernacular landscapes, and ethnographic landscapes.

**Cusate forelands** – A type of sand spit that is wider than it is long.

***De facto* wilderness** – An area that is managed as if it were wilderness, but which has not been officially designated and included in the national wilderness preservation system. Under *NPS Management Policies*, the National Park Service manages lands that have found to be suitable for wilderness, but have not yet studied or actions have not been taken on a wilderness proposal or recommendation, as *de facto* wilderness.

**Environmental impact statement** – As required by the National Environmental Policy Act (NEPA), a detailed document that is prepared when a proposed action or alternatives have the potential for significant impact on the human environment.

**Environmentally preferred alternative** – Of the action alternatives analyzed, the one that would best promote the policies in §101 of the National Environmental Policy Act.

**Ethnographic resource** – Objects and places, including sites, structures, landscapes, and natural resources, with traditional cultural meaning and value to associated peoples. Research and consultation with associated people identifies and explains the places and things they find culturally meaningful. Ethnographic resources eligible for the National Register of Historic Places are called traditional cultural properties.

**General management plan (GMP)** – A plan that clearly defines direction for resource preservation and visitor use in a park, and serves as the basic foundation for decision making.

**Impairment** – An impact so severe that, in the professional judgment of a responsible NPS manager, it would harm the integrity of park resources or values and violate the 1916 NPS Organic Act.

**Interpretive media** – This term is basically the same as nonpersonal interpretive services. Examples of these media include: includes park brochures and other publications, museum and visitor center exhibits, wayside exhibits, web pages, audiovisual programs, and radio information systems.

**Life estate** – Structures and land leased back to the original owner for the lifetime of that owner. The park's enabling legislation authorized the government to offer life estates to the prior owners at the time their land was acquired.

**Lightscape** – The state of natural resources and values as they exist in the absence of human-caused light. This is usually associated with natural darkness and night skies.

**Minimum requirement concept** – A two-step process that documents 1) the determination as to whether or not a proposed management action is appropriate or necessary for the administration of the area as wilderness, and does not pose a significant impact to the wilderness resources and character; and 2) the selection of the management method (tool) that causes the least amount of impact to the physical resources and experiential qualities (character) of wilderness.

**Nonpersonal interpretive services** – Non-personal interpretive services are those that do not require the presence of staff. Examples of these services include wayside exhibits, visitor center exhibits, radio information systems, and computer technologies.

**Nonwilderness area** – An area that does not meet wilderness suitability criteria, or other lands that may satisfy the criteria but for other reasons are not included in a wilderness proposal. These areas may vary between alternatives in a wilderness study / environmental impact statement.

**High-water mark** – In the case of Lake Superior, the highest level reached by the lake's water. Typically, this corresponds to a surface elevation of about 602 feet in the Apostle Islands, and often corresponds to stable vegetation lines adjacent to beaches.

**Personal interpretive services** – Personal interpretive services are those in which staff interact with visitors. Examples of these services include ranger talks, staffed visitor centers, and other ranger-conducted activities.

**Potential wilderness** – Lands that possess wilderness characteristics that would normally qualify them for designation with


the national wilderness preservation system but contain temporary non-conforming conditions (such as structures or roads) or uses (such as inholdings or valid mining claims) that prevent their being immediately designated as wilderness. Potential wilderness may be identified in NPS wilderness proposals, wilderness recommendations, and within legislation designating other portions of a park as wilderness.

**Proposed wilderness** – A suitable wilderness area that has been studied by the National Park Service and has been submitted as a proposal to the director but has not been approved by the Department of the Interior.

**Recommended wilderness** – A suitable wilderness area that has been studied and proposed by the National Park Service, recommended for wilderness by the Secretary of the Interior to the President, and then transmitted by the President to Congress. Once approved by the Secretary, the area can be considered recommended wilderness for management purposes.

**Record of Decision** – A document that is prepared to substantiate a decision based on an environmental impact statement.

**Sandscape** – A landscape that is dominated by sand. In the Apostle Islands that are various sandscapes, including sandspits, cusped forelands, tombolos, numerous beaches, and a barrier spit.

**Scoping** – The process followed in preparing a National Environmental Policy Act (NEPA) document for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action. ernal scoping is when NPS staff



decide what needs to be analyzed in a NEPA document. External scoping is early public involvement in a NEPA process, intended to identify what issues and concerns the public has regarding a proposed action.

**Soundscape** – The natural soundscape is the aggregate of all the natural sounds that occur in an area, together with the physical capacity for transmitting natural sounds. Natural soundscapes exist in the absence of human-caused sound.

**Suitable wilderness** – An area that possesses the qualities and character, as identified within the Wilderness Act, which would qualify it for designation within the national wilderness preservation system. An area where, based upon a wilderness suitability assessment, the NPS Director has approved the determination of suitability for wilderness designation.

**Tombolo** – A sand feature that joins either two islands or an island to the mainland.

**Use and occupancy agreement** – Structures and land leased back to the original owner for a finite period of time. The park's enabling legislation authorized

the government to offer use and occupancy agreements to the prior owners at the time their land was acquired.

**Visitor nonwilderness experiences** – The experiences a visitor has in those parts of the park that are not included in a wilderness proposal. This includes interactions with natural and cultural resources, park staff, and park facilities (e.g., campgrounds, trails) that visitors use. Examples of activities that generate these visitor experiences include using a visitor center or wayside exhibit, walking on a self-guided interpretive trail, socializing at a picnic area or group campsite, or watching a ranger presentation at an amphitheater.

**Wilderness suitability assessment** – A brief memorandum, from a regional director to the Director, that makes a management determination as to the suitability of a park's lands for wilderness designation. All lands and waters found to possess the characteristics and values of wilderness, as defined in the Wilderness Act, and determined suitable pursuant to the wilderness suitability assessment are formally studied to develop a proposal for wilderness designation.

## INDEX

- Basswood, 26, 33, 41, 44-45, 54-56, 61, 78, 83-84, 87-88, 91-92, 96-97  
Bear, 29, 33-34, 37, 41, 44, 54, 56, 80, 107  
campsite, 59, 61, 68, 76  
Cat, 33, 37, 41, 44, 60  
Devils, 26, 33, 41, 44, 51-52, 61, 63, 88  
dock, 26, 56, 59, 68  
Eagle, 33, 37, 41, 44, 52, 55, 60, 109  
ethnographic resource, 15, 56-57, 82, 84-85  
fish camp, 29, 61, 62  
fishing, 5-6, 11, 13-14, 17, 34, 53, 55, 57, 105  
general management plan, 28, 67, 74-76, 78-79, 81, 86, 89  
group camp, 59, 61, 89, 90-91, 99  
Gull, 6, 33, 37, 41, 44, 52, 55, 60  
Hermit, 33, 41, 44, 54, 84, 88, 98  
Historic Preservation Act, 15, 63, 81-82, 84-85  
hunting, 5, 11, 13-14, 54-55, 105  
interpretive trail, 68, 90, 202  
Ironwood, 33, 37, 41, 44, 54, 109  
lighthouse, 52, 56, 61-62, 82  
Long, 18, 20, 26, 41, 43-45, 53-55, 62, 70, 78, 83, 87-88, 105  
Manitou, 26, 29, 33-34, 41, 44, 54, 56, 61-62, 88  
Michigan, 18, 26, 33, 37, 41, 44, 55-56, 61, 63  
Native American, 11, 14, 17, 20-21, 56, 74, 81-82, 84-85  
North Twin, 33, 37, 41, 44, 52  
Oak, 26, 29, 33, 41, 44, 52, 54-55, 60-61, 63, 84, 88, 98  
Otter, 26, 33, 41, 44, 60, 88  
Outer, 26, 33, 37, 41, 44, 52, 54-55, 60-61, 63  
picnic table, 5, 61, 89, 90-92, 99  
Presque Isle, 34, 37, 44, 53, 59, 61-63, 105  
quarry, 80, 98  
Raspberry, 26, 33, 41, 44, 52, 54, 60-6, 88  
Rocky, 26, 29, 33-34, 41, 44, 60-3, 78, 83-84, 88  
Sand, 6, 26-27, 29, 33-34, 41, 44-45, 49, 52, 54, 56, 60-63, 78, 80, 83-84, 87-88, 91-92, 96-97  
soil, 51-52, 70, 76-78, 99  
South Twin, 26, 33, 41, 44, 60-61, 88  
Stockton, 26, 29, 33-34, 37, 41, 43-44, 50, 53-55, 59-63, 78, 83-84, 105  
trail, 17, 93-97  
vegetation, 15, 53, 63, 76-79, 99  
visitor nonwilderness experience, 67, 90-91  
Wilderness Act, 3-5, 9-12, 26-27, 29, 34, 37, 58-59  
wilderness resource, 5, 16, 28, 33, 42-43, 45, 49, 67, 71-72, 86-92, 99  
wilderness suitability, 3, 9, 26, 103  
wildlife, 13, 15, 63, 73, 77-79  
York, 29, 33-34, 41, 44, 88