



Isle Royale NATIONAL PARK

Nonwilderness Cultural Resources Management Plan / Environmental Assessment





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Summary

Isle Royale National Park is home to hundreds of cultural sites including prehistoric and historic mining sites, shipwrecks, historic resorts and cottages, historic fisheries, historic boats, lighthouses and navigational aids, and more recent historic infrastructure associated with the management of the park. The park also has a rich ethnographic and traditional use history as well as a vast and growing museum collection. These resources are key to the significance of the park and require research and documentation as well as active management in order to be preserved and shared with the public. This document is a step toward development of a holistic management approach for these important park resources.



This document is part of Isle Royale National Park's planning portfolio. It addresses some elements of the park's required management plans; additional elements will be addressed in future planning documents. Other elements required for the management of cultural resources specifically will be found in the park's future wilderness stewardship plan—including the treatment and use of historic structures, historic districts, and cultural landscapes in wilderness and potential wilderness at Isle Royale. Together, Nonwilderness Cultural Resource Management Plan / Environmental Assessment (CRMP/EA) and the future Wilderness Stewardship Plan / Supplemental Environmental Impact Statement (WSP/SEIS) describe the actions to be taken in the management of the park's cultural resources planning portfolio and describe the vision for the park's future to meet National Park Service (NPS) policy requirements. Proposed elements in the WSP/SEIS include the actions that will require further analysis because of the potential for significant impact; the actions included in the CRMP/EA have no significant impacts and are high priority management actions ready to be acted upon. Once final decisions on actions described in the CRMP/EA and the WSP/SEIS have been made, a single summary document, with prioritizations and proposed timing of activities, will be produced that will help guide the implementation of the actions proposed in the two environmental compliance documents.

The approval of this CRMP/EA does not guarantee that funding will be available to implement it. Ultimately, implementation depends on partner assistance, fundraising efforts, remediation, federal budgets, and staffing levels. Full implementation may be years in the future. The implementation of the approved CRMP/EA could also be affected by other factors such as additional data or regulatory compliance requirements, competing national park system priorities, and unforeseen environmental changes.

Purpose of the Cultural Resource Management Plan / Environmental Assessment

The purpose of the CRMP/EA is to develop a long-term, comprehensive strategy for managing the nonwilderness cultural resources of Isle Royale National Park to ensure consistent and appropriate identification, to inform preservation treatment, and to guide future interpretation of these resources. This document provides specific guidance and sets priorities for the management of the cultural resources of Isle Royale. It identifies future research needs to expand knowledge of Isle Royale's rich human history. This document will also inform the development of resource-based interpretation for a future interpretive planning effort and will help guide the overall management direction of the cultural resources of the park.

The Alternatives

ALTERNATIVE A (NO-ACTION ALTERNATIVE)

The no-action alternative represents the continuation of ongoing management of cultural resources within Isle Royale National Park. Key actions associated with this alternative would be continued monitoring and evaluations of known cultural resources in the park as well as continued inventories for unidentified resources as staffing and resources allow. Lighthouses currently owned by the US Coast Guard would continue to be maintained by the Coast Guard and the National Park Service would participate in any efforts initiated by the Coast Guard to divest them to another government entity, not for profit organization, or the park itself. Historic structures and landscapes currently managed under special use permits by descendants of life lease holders would remain, for the most part, inaccessible to park visitors upon the expiration of the special use permits, which would not be renewed.

ALTERNATIVE B (PREFERRED ALTERNATIVE)

Alternative B seeks to preserve and provide proactive stewardship of the full range of cultural resources at Isle Royale and to ensure appropriate management of fundamental resources and values. The alternative emphasizes development of a vibrant program of partnerships intended to help the National Park Service preserve historic properties reflecting the entire scope of human history at Isle Royale. It also seeks to provide interpretive enhancements to key cultural resources that will allow park visitors to better engage with them. Key elements of the alternative include:

- enhanced research efforts on gaps in the park's understanding of the archeological record;
- enhanced interpretation of historic mining sites;
- updates and infrastructure enhancements at cultural landscapes on Washington and Barnum Islands, including adaptive reuse of historic structures and improvements to visitor access;
- re-establishment of a demonstration fishery at the historic Edisen Fishery;
- preservation of the vernacular boats *Tern* and *Belle* at the Edisen Fishery with the *Tern* being restored for exhibit and/or functional use in the water;
- acquisition of the Isle Royale and Passage Island Lighthouses from the US Coast Guard;
- rehabilitation and provision of visitor access to the Rock of Ages, Isle Royale, and Passage Island lighthouses;
- exterior and landscape rehabilitation at the Rock Harbor Lighthouse; and
- establishment of a vibrant program of partnerships for historic preservation at the park.

Most of the proposed efforts of this alternative depend on the assistance of partners.

ALTERNATIVE C

Alternative C emphasizes research, particularly of archeological and ethnographic resources, and provides for stabilization and preservation of historic and cultural resources in the park. The alternative has many commonalities to alternative B in terms of effort needed to protect and preserve historic resources but fewer opportunities for interpretive enhancements and adaptive reuse. The alternative is not as reliant upon the assistance of partners for success. Key elements of the alternative include an emphasis on research and documentation of archeological and ethnographic resources, preservation of the fishery resources at Washington Island but without interpretive enhancements and opportunities proposed in Alternative B, and acquisition of lighthouses from the US Coast Guard followed by exterior rehabilitations only without providing visitor access to any interior spaces.

PUBLIC COMMENT

If you wish to comment on the environmental assessment, you may post comments online at: <http://parkplanning.nps.gov/isro> or you may mail or hand deliver comments to:

Superintendent
Isle Royale National Park
800 East Lakeshore Drive
Houghton, MI 49931

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. Although you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. Comments will not be accepted by fax, email, or in any other way than those specified above. Bulk comments in any format (hard copy or electronic) submitted on behalf of others will not be accepted.

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Chapter 1

PURPOSE AND NEED





CHAPTER 1. PURPOSE AND NEED

Introduction

This document is the draft Nonwilderness Cultural Resources Management Plan / Environmental Assessment (CRMP/EA) for Isle Royale National Park (Isle Royale or the park). It is an implementation document focused on stewardship of the park’s cultural resources, excluding consideration of the treatment and use of historic structures and installations in wilderness, which will be evaluated in the WSP/SEIS. It supplements the Isle Royale National Park Final General Management Plan / Environmental Impact Statement (NPS 1998). The National Park Service (NPS) is proposing management priorities and key management actions for the park’s cultural resources, including its archeological resources, cultural landscapes, historic structures, museum collections, and ethnographic resources that will inform management over the next 20 years. The CRMP/EA does not propose management actions for cultural resources in wilderness or potential wilderness areas of the park. Priorities for wilderness actions will be proposed and analyzed in the Wilderness Stewardship Plan / Supplemental Environmental Impact Statement (WSP/SEIS).

Implementation level plans, such as this CRMP/EA, are intended to be documents used long term that identify and recommend specific actions for achieving a park’s purpose, maintaining significance, managing cultural resources, and providing appropriate visitor experiences related to cultural resources.

This CRMP/EA fulfills a park priority for resource preservation and facility asset management at Isle Royale National Park and serves as a component of the park’s planning portfolio. This follows the National Park Service’s “Planning Portfolio” construct, consisting of a compilation of individual plans, studies, and inventories that together guide park decision making. The planning portfolio enables the use of targeted planning products (such as this one) to meet a broad range of park planning needs, a change from the previous National Park Service focus on standalone general management plans. The general management plan remains a critical piece of the planning framework and will be revised in a timely manner through the park’s planning portfolio.

Background

Isle Royale National Park is located in the northwestern section of Lake Superior within 14 miles of the Ontario (Canada) shoreline, 20 miles east of Minnesota, and approximately 45 miles north of the Upper Peninsula of Michigan. There are no roads on or leading to the island. The park includes the primary island, known as Isle Royale, and more than 400 smaller islands, which together form a complex, forested archipelago surrounded by the deep, cold waters of Lake Superior (figures 1 and 2). The park was formally authorized on March 3, 1931, and was officially established on April 3, 1940. Since establishment, the park has been managed with a focus on backcountry-based recreation, in concert with the protection of natural and cultural resources. In 1976, 132,018 acres of the park's surface land base, or 99% of the total 133,788 land acres, were designated as wilderness or potential wilderness.

Evidence of human use, activity, and habitation can be found throughout Isle Royale and in the surrounding waters. As a rich source of fish, wildlife, plants, and minerals, Isle Royale has attracted human visitors and residents for millennia. Cultural resources ranging from lithic scatters of chipped stone to lighthouses reveal a rich history of human use spanning from Archaic times (ca. 3000 BC) to the present day and reflect a rich, freshwater maritime history.



The long human history of Isle Royale has been tempered by the wildness of the place. For more than 4,000 years, people risked the lake crossing for copper, the rich fishery, and the spiritual beauty of what the Anishinaabe (Ojibwe) came to call Minong, “the good place.” The works of Caven Clark, Timothy Cochrane, Theodore Karamanski and Richard Zeitlin, Kathryn Franks and Arnold Alanen, Rebecca Toupal and others, Philip Scarpino, and many other scholars demonstrate the long, transient human interaction with this maritime environment. For millennia, indigenous people mined copper and harvested fish and other resources in an episodic pattern of human contact that reflects the seasonality of access to Isle Royale today.

In recent history, the Ojibwe of the mainland north shore continued the pattern of temporary habitation of the islands to mine and fish and for spiritual purposes. They introduced the resources of Minong to European Americans who also valued the copper, fish, and other resources of what they came to call Isle Royale. The French, British, and Americans had little interaction with Isle Royale during the centuries of the international fur trade. They navigated the shoreline waters of Lake Superior and often disembarked from Grand Portage, just west of Isle Royale, to access the inland waterway of the northwest trade.

Beginning in 1837, Ojibwe traditional ecological knowledge informed the brief development of the American Fur Company's commercial fishing efforts and subsequent commercial copper mining by other companies. Native people worked in the commercial ventures for wages and sold miners provisions of fish and game. The first United States (US) commercial mining effort ended in 1855. Two successive waves of US copper mining (1873–1881 and 1889–1893) came and went. The US mining ventures left a rare industrial imprint of historic archeological sites and archeological districts with remnant landscapes on Isle Royale, which was mostly destroyed on the Keweenaw Peninsula to the southeast of Isle Royale, by a more profitable and intense copper mining industry.

As an island archipelago in the world's largest body of fresh water, Isle Royale has a rich maritime history. The completion of the first navigation locks at Sault Ste. Marie, Michigan, in 1855 opened Lake Superior to increased maritime travel. A number of lighthouses were built to aid navigation, including Rock Harbor Lighthouse in 1855, Isle Royale Lighthouse in 1875, Passage Island Lighthouse in 1882, and Rock of Ages Lighthouse in 1908. The island could be both a safe haven during storms and a deadly obstacle that claimed numerous vessels over the years. Isle Royale is well known for its many shipwrecks; 10 major ships and many smaller vessels have met their demise in Isle Royale waters, and the island is an important destination for experienced divers.



Remote Isle Royale, with its abundant fishery, supported commercial fishing until the late 1950s. While the Ojibwe continued to fish into the 20th century, Isle Royale, with its many islands and sheltered inlets, attracted Scandinavian immigrants from Sweden and Norway who applied folk fishing traditions, developed scores of fisheries around the island, and supplied a commercial fishing industry. No less than 100 fishing families were based on the island at the peak of the industry in the early 1900s. Standing structures and archeological remains dot the island's harbors, and coves are testament to the wide sweep of commercial fishing interests. Lake trout populations declined severely, however, when in the late 1940s the arrival of the decimating lamprey compounded the pressures of commercial fishing. Even though fish populations rebounded in later decades, the establishment of Isle Royale National Park meant an end to widespread commercial fishing operations.

Many of Isle Royale's early Euro-American visitors were attracted by natural resources but discovered the isolation and remoteness of the area limited their ability to access those resources. Around the turn of the 20th century, tourism began to blossom at Isle Royale. The isolation and rugged nature of the area that draws visitors today appealed to Americans more than a century ago as they sought escape from hot, crowded, and dirty cities, as well as hay fever. As their contemporaries had successfully done in places like Yellowstone and Yosemite National Parks, transportation companies, looking for additional passengers, fostered the growth of tourism to Isle Royale. Lodges and resorts opened at Washington Island, Belle Isle, Tobin Harbor, and Rock Harbor; a few commercial fisherman entrepreneurs operated other, smaller sites. The clean air and healthful attributes of the rustic setting as well as opportunities for rugged forms of recreation were advertised themes to Americans learning to cope with the changing reality of modern life. Resort tourism thrived in the first three decades of the 20th century and helped give rise to the idea of making the island a national park.

Many who visited Isle Royale found that they wanted a more permanent relationship with the island. The area had been surveyed in the early years of the century, and land was available for purchase. Individuals and family groups began to build summer camps and cottages in places like Tobin Harbor, Washington Harbor, and Rock Harbor. Those who could not afford land or thought purchase unnecessary constructed cabins or fish camps and occupied these locations without title. Small, protected islands or pieces of lakeshore were popular purchases, and soon dozens of camps were built on the main island and other smaller islands constituting the archipelago. In the mid-1930s, soon after the park was established, many cabin owners were given a unique opportunity to sell their land and buildings and stay on as life lessees. Leases were issued for the lifetime of the property owners and allowed for continued use under specified terms. All of these leases have since expired although some family members, alive at the time the leases were signed, have permits to use the properties through their lifetimes. Fishermen who did not own their fishing camps were offered annual special use permits to continue fishing on a limited scale.

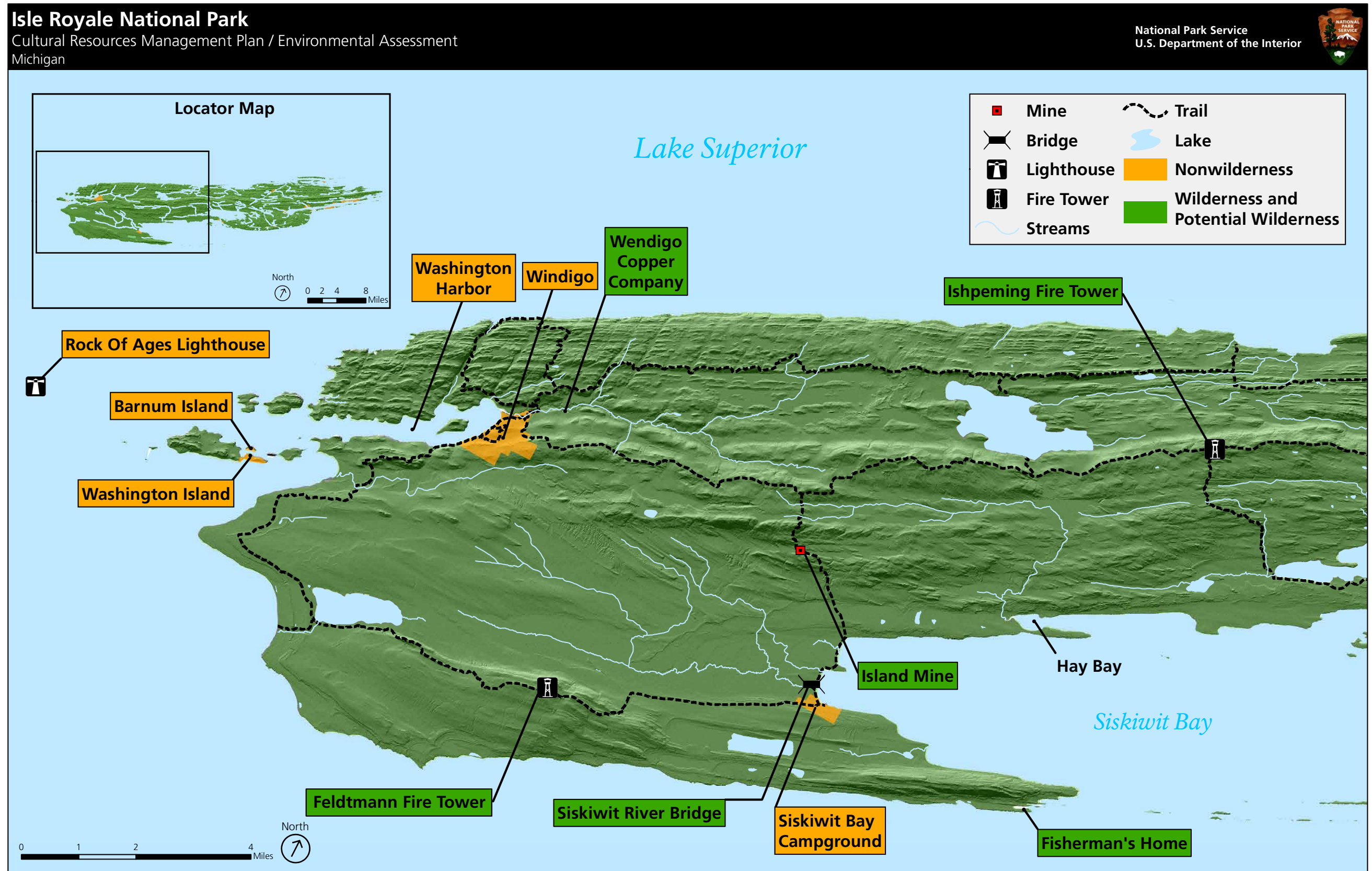
Following park designation, the National Park Service focused on developing the island's infrastructure. The Civilian Conservation Corps (CCC) played an important role in the construction of trails and facilities on the island. The CCC camps were located at Siskiwit Bay, Rock Harbor (Daisy Farm), and Washington Harbor and served as staging areas for trail and campground installations. Between 1935 and 1941, the camps were an important presence on the island and were instrumental in fighting a devastating 1936 fire.

Cultural sites are an important part of Isle Royale National Park. These sites document the diverse human uses of the island over thousands of years. They give perspective to the power of Lake Superior and the isolation of this wilderness island and its natural environment.



Figure 1.
Western Half of Isle Royale National Park displaying wilderness boundary and the primary locations of resources mentioned in this document.

Note that areas indicated in wilderness will be discussed in the WSP/SEIS.

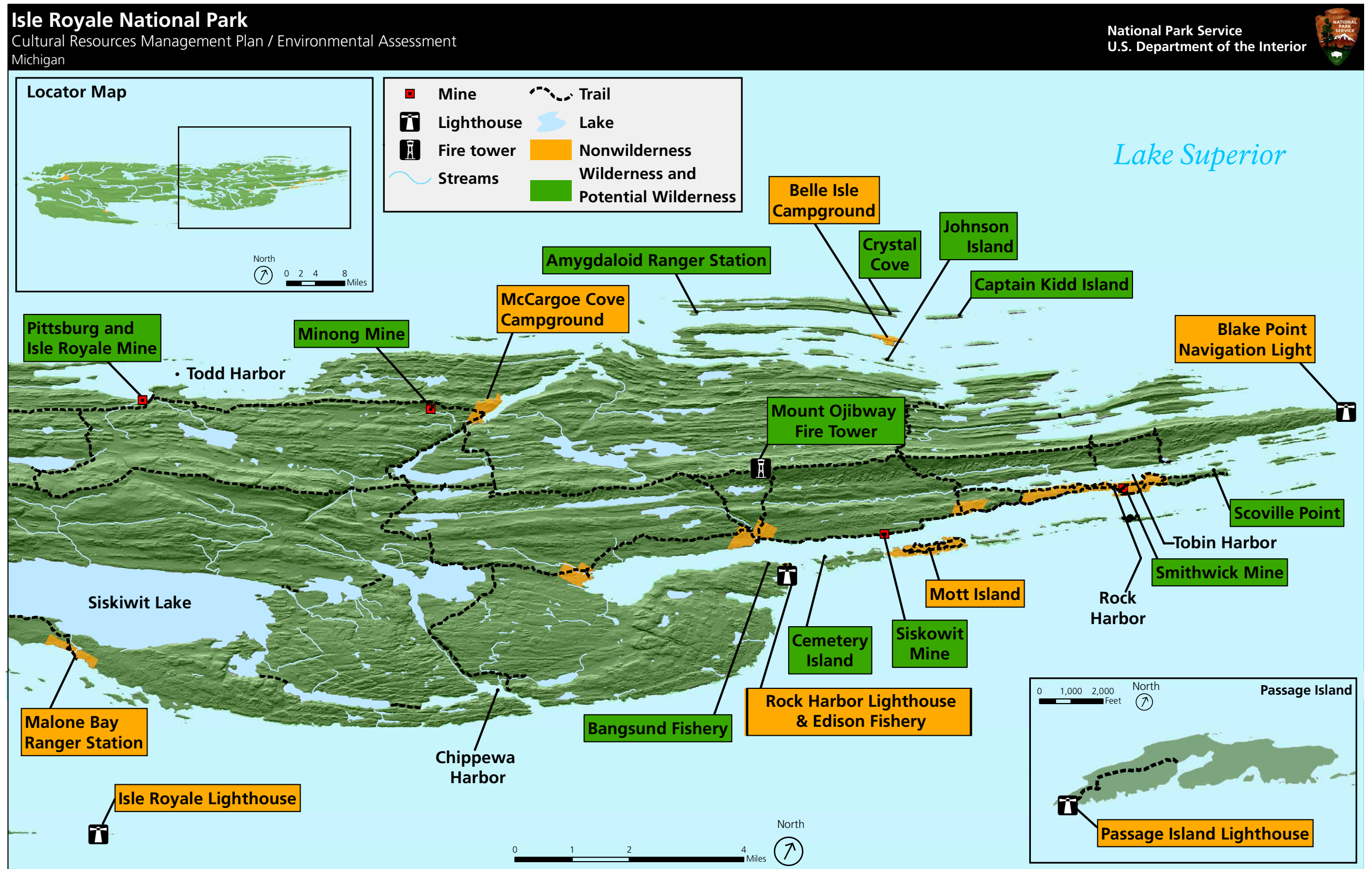


Produced by Denver Service Center Planning Division

March 1, 2019

Figure 2. Eastern half of Isle Royale National Park displaying wilderness boundary and the primary locations of resources mentioned in this document.

Note that areas indicated in wilderness will be discussed in the WSP/SEIS.



Purpose and Need for the Cultural Resource Management Plan / Environmental Assessment

The purpose of the CRMP/EA is to develop a long-term comprehensive strategy for managing the cultural resources of Isle Royale National Park to ensure consistent and appropriate identification, to inform preservation treatment, and to guide future interpretation of these resources. This document provides specific guidance and sets priorities for the management of the cultural resources in nonwilderness areas of Isle Royale. Additional guidance for occupancy and use of the cultural resources in wilderness and potential wilderness areas will also be in the WSP/SEIS. This document identifies future research needs to expand knowledge of Isle Royale's rich human history. This document will also inform the development of resource-based interpretation for a future interpretive planning effort and will help guide the overall management direction of the cultural resources of the park.

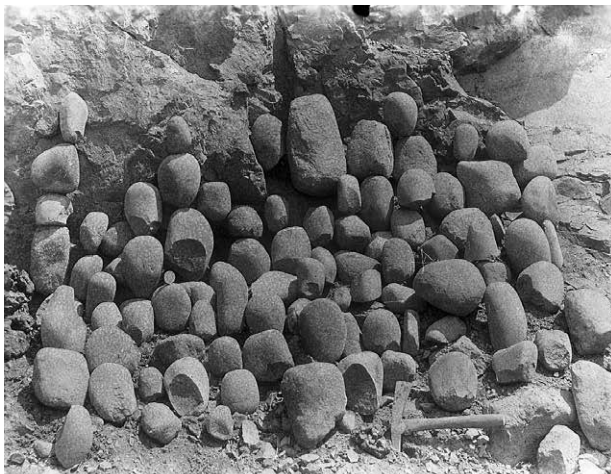
A cultural resources management plan is needed to prioritize the limited staff time and resources available for documentation and maintenance of the wide scope and variety of cultural resources at Isle Royale. There are gaps in knowledge about cultural resources and the contextual history of the human experience at Isle Royale. A need exists to assess and determine these gaps in knowledge, their extent, and the appropriate method to resolve them. The Final General Management Plan / Environmental Impact Statement (GMP/EIS) for Isle Royale National Park was completed in 1998, but specific guidance for managing historic and cultural resources was deferred to a later planning effort, hence the need for this implementation level of program management.

There is a need to determine appropriate visitor use, interpretation, and partnerships for cultural resources at Isle Royale. Resource type, location, and chosen preservation treatment all have implications regarding appropriate visitor use and experience, interpretation, and partnerships. Additionally, a variety of appropriate partnerships and opportunities for cooperation with local communities, government agencies, nonprofit organizations, and other entities need to be considered to assist with preservation efforts.

Scope of the CRMP/EA

RESOURCES CATEGORIES CONSIDERED IN THE CRMP/EA

The following cultural resource categories are specific to the cultural resources at Isle Royale and serve



as a framework for describing the alternatives in chapter 2 and throughout this document. Many of these categories have a suite of types of cultural resources within them; for example, historic mining would have archeological, landscape, ruins, cemetery, and possibly other types of resources. The 11 cultural resource categories follow.

Precontact and Historic Mining. American Indians used Isle Royale for at least 4,500 years. Their long history of use is manifested in archeological remains of fishing and habitation camps as well as by hundreds, perhaps thousands,

of both deep and shallow mining pits across the island. Bedrock outcrops were also mined and exhibit features similar to those related to historic mining endeavors. Historic survey parties used some of these very features as clues to locate many of the island's more recent mining operations. Relics of American Indian mining activities remain visible on the landscape today. Smaller operations exhibit a handful of pits or trenches. More extensive prehistoric mining features, such as those in the vicinity of McCargoe Cove, include numerous pits and trenches sometimes intermixed with historic mining components. Water-worn cobbles that exhibit broken or pitted striking surfaces, or hammerstones, are typical in areas that have been mined by American Indians and are sometimes found in the vicinity of the mined areas.

The Isle Royale landscape features no less than 26 historic mine locations. Related activities focused on exploration, development, and production of the island's copper resources. Although most of the endeavors never made it past the exploration phase, a handful continued into development and production. The former are typically exemplified by small prospect pits and trenches, cabin ruins, and trash piles. When a mine transitioned into development and production phases, its infrastructural footprint also expanded. These industrial complexes are exhibited by features directly related to the mine operations; however, domestic aspects of life are also represented. Small living areas or "town sites" in the vicinity of the larger operations included cabins, barns, water wells, trash dumps, and, perhaps the most evocative of features related to mid-19th-century island life, cemeteries. Mine operations featured steam engines, hoist houses, pump houses, powder houses, blacksmith shops, warehouses, stamp mills, dams, reservoirs, water diversion, wagon roads, dock houses, and wharves. The mine workings were much more extensive than those tied to exploration and featured large acreages of poor rock, mine trenches, mine shafts, and mine adits. Some exploration efforts on Isle Royale were larger than others, resulting in industrial footprints still visible on today's landscape. One particular endeavor near today's Windigo featured a sizable wharf complex, along with an extensive network of wagon roads. These roads linked the wharf to interior town sites, trenching locations, and diamond drilling stations. Today, segments of the island's historic wagon roads are traced by the Huginnin, Greenstone, Minong, and Island Mine hiking trails.



Shipwrecks. This category includes all of the major shipwrecks. Other submerged features, such as docks and related detritus, are best categorized under their respective themes. Mining sites, recreational resorts and cottages, and fishery sites often include submerged components, including docks.

Cemeteries and Burial Sites. People have been interred at Isle Royale for many years. The most notable cemeteries are at Cemetery Island,

Island Mine, and the Bangsund Fishery. Most of the known burials are related to historic mining and possible shipwreck histories; however, indigenous people and fisher people also have been interred at Isle Royale. All of the park's known cemetery sites are in wilderness or potential wilderness, but unidentified burials may exist elsewhere.

Miscellaneous Historic Activities. This category includes other activities in the historic period, particularly logging and trapping. Three different logging operations harvested island forests and once included roads, cabins, a mess hall, barns, and offices. Fur trappers have come and gone throughout the historic period, and many fishermen augmented their lake-based income with trapping. Deteriorated remains of trapping cabins and logging camps are scattered about on Isle Royale. Remnants of miscellaneous trails used by loggers and hunters are still present on the island.

Recreational Resorts and Cottages. Beginning in the late 1890s, Isle Royale experienced a shift from interests related to mining to those associated with recreation. The Johns Hotel, the first tourist hotel on the island, perhaps best illustrates this point as it was established by a former Isle Royale miner. Through the 1910s and 1920s, resorts were located in the Rock Harbor region, at Tobin Harbor and



Belle Isle, and on Washington Island. Each featured an eclectic array of structures, including main lodges, dining halls, rental cabins both small and large, auxiliary cabins and sheds, generator shacks, post offices, and docks. Amenities were not always rustic, as exemplified by the nine-hole golf course at Belle Isle Resort and the single-lane bowling alley at Singer Resort. The latter also featured a Marconi wireless tower to communicate with the mainland. Although the bulk of these resort complexes are now gone, a handful of standing structures and archeological

features remain. Many of the island's recreational cabins tie directly to the resort era, as resort visitors became aware of land opportunities and opted for more private summer respites. Such cabins are spread across the island, in places like Rock Harbor, Tobin Harbor, the north shore, and Barnum Island. Approximately half of the cabins were removed after park establishment. Most of those that remain are tied to prior life-lease agreements, which allowed for continued private use for a specified time period in return for a lower purchase price. Where structures remain, the camps typically feature main cabins, auxiliary cabins, sheds, privies, and docks. Structural remains are present at former cabin locations, although these features are more archeological in nature.

Folk and Commercial Fisheries. This category includes the following cultural resource management property types: structures, ruins, archeological deposits, and landscapes. Fisheries included an occupational component (docks, fish houses, net houses, net reels, fish smokers) and residential structure(s). These sites also include archeological evidence of precontact fishing by American Indians. Fisheries sites are scattered widely across Isle Royale, and virtually any sizable bay or harbor was once occupied by fishermen and their families. Isle Royale fisheries were built and operated by the American Fur Company (1830s), McCullough (1850s), and Scandinavian immigrants (mostly from 1880 to date). At its high point circa 1910, more than 100 fishermen were setting their nets in island waters, and, with their families, more than 400 people lived on the island during the six- to eight-month fishing season. Although fisheries once dotted the sheltered bays and harbors of Isle Royale, few remain, particularly those with a complete group of buildings and occupational equipment. Fisheries commonly include submerged cultural resources such as dock cribs and artifact scatter on the nearby lake bottom.

Vernacular Boats. Vernacular boats (handmade wooden boats using traditional design and techniques) were once common on Isle Royale. Larger fisheries, for example, might have had four, five, six or more boats of different shapes and sizes. The two types of boat designs particularly adapted to western Great Lakes sea conditions were the mackinaw boat and the herring skiff. Modified mackinaw boats with engines, called gas boats, were quite large; other boats, such as rowing dories, were smaller. Many vernacular boats have been removed from Isle Royale and are in the hands of fishermen or their descendants on the mainland. The few that remain on Isle Royale are either pulled ashore or have been sunk or scuttled in island waters.



Lighthouses and Navigational

Aids. There are four lighthouses on the island—Rock Harbor Light, Isle Royale Light, Passage Island Light, and Rock of Ages Light. Lighthouse landscapes feature the lighthouse and tower itself but may also include auxiliary structures such as foghorns, boathouses, winch houses, tramways, fuel sheds, radio towers, docks, and privies. Trash piles and foundation ruins may also be apparent. Smaller, unmanned navigational aids or day markers were sometimes employed on Isle Royale at locations such as

Chippewa Harbor, Blake Point, West Caribou Island, and Round Island. Related features include the day markers at Chippewa Harbor entry and Blake Point. A foghorn compressor shed and concrete foundation ruins are still visible on West Caribou Island. An elevated concrete pad is still visible on the north side of Round Island.

Civilian Conservation Corps, Mission 66, and Other NPS Infrastructure. This category includes historic NPS structures found at Mott Island, Rock Harbor, and Windigo. Mission 66, a late-1950s architectural theme, is exemplified at Mott and Rock Harbor and typically features administrative and residential buildings with multicolored cinder-block siding. Structures such as the three fire towers (Ojibway, Ishpeming, and Feldtmann) and the Siskiwit River Bridge are attributed to the Mission 66 period although they are architecturally distinct and do not necessarily comply with the characteristics described above. The earlier CCC era is less visible on today's landscape, although a few structures, including the stone pump house, are present on Mott Island. The camps at Daisy Farm, Siskiwit Bay, and Windigo were removed long ago; however, archeological signatures remain. This category also includes scientific research structures and installations, including the Bangsund Fishery complex and moose exclosures.

Ethnographic Use and Resources. Two disparate groups associated with ethnographic use and resources are: (1) Ojibwe from the nearby mainland shores, and (2) Scandinavian-Americans who became commercial or folk fishers at Isle Royale. Ethnographic resources may be landscapes, plants, animals, and places of great significance to groups who came to Isle Royale. Examples of ethnographic resources identified at Isle Royale include lake trout, which were of particular importance to Scandinavian-American fishers. Select plants and animals, such as moose, also are of great importance to Grand Portage tribal members. The Sugar Bush, located near Island Mine, was a traditional maple sugar harvesting location that was highly valued and passed down among members of one Ojibwe



family. More than 60 ethnographic interviews have been completed and are curated at collection at Isle Royale, Northeast Minnesota Historical Center in Duluth, and the Minnesota Historical Society in St. Paul.

Museum Objects. The museum collection at Isle Royale National Park includes thousands of historic and pre-contact artifacts from archeological sites as well as natural resource collections. All of the objects are collected to document the presence of certain human activities or animals and plants and for study purposes. The vast majority of the collection is curated on the mainland, and the related objects no longer remain at their point of discovery.

More detail about each of these resource categories described above can be found in chapter 3 in the Affected Environment section.

PROGRAM NEEDS ADDRESSED IN THE CULTURAL RESOURCES MANAGEMENT PLAN / ENVIRONMENTAL ASSESSMENT

Management of Recreational Cabin Sites and Fisheries. There is a need to define appropriate management of historic recreational cabin and fishery complexes following the expiration of special use permits that allow for private occupancy and maintenance. Appropriate management should be in compliance with cultural resource management law and policy, including The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation. Expired life leases authorizing private residential use of publicly owned summer cabins and commercial fishery bases will not be renewed or extended. Life leases were typically granted to island property owners and their minor children, who were then allowed to occupy the residences for the remainder of their lives. The last original life lease expired in March 2016. In 1977, special use permits were employed to provide for certain living children who were left out of the original agreements. Seven sites are currently occupied under the 1977 permits, some in wilderness. The final disposition and uses of these recreational cabins and fisheries outside of wilderness will be addressed in this document. Those located in wilderness or potential wilderness will be addressed in the future WSP/SEIS and are beyond the scope of this CRMP/EA.

Acquisition and Management of Lighthouses. The National Park Service is working closely with the US Coast Guard in anticipation of accepting ownership and management responsibility for two historic light stations, Passage Island and Isle Royale. The National Park Service also currently owns and manages the historic Rock Harbor Lighthouse and the Rock of Ages Lighthouse. With the heightened management responsibility in the future, there is a need to define appropriate ways to manage the lighthouses. This CRMP/EA addresses ownership of the light stations and potential restoration efforts of lighthouses.

Short- and Long-Term Priorities for Cultural Resource Treatments. Cultural resources on Isle Royale are deteriorating, and the cultural resource management responsibilities of the park are increasing. This CRMP/EA prioritizes limited resources for stabilization treatment to maximize cultural resources preservation upon implementation of the CRMP/EA. This document also develops long-term priorities for treatment of cultural resources.

Museum Collections. The museum collections from Isle Royale are not well documented in a digital format; thus, they are not easily accessible online to researchers or available for use in online exhibits. There is a need to promote the use of these collections to both enhance public knowledge and for research to further the understanding of the park and its context within regional and national history. As residential special use permits expire for historic properties and related historic recreation and fishery complexes, decisions need to be made regarding items associated with these structures. Ongoing efforts to complete a transition from current collection storage at park headquarters in Houghton, Michigan, to the Lake Superior Collections Management Center (a unified collection storage facility) at Keweenaw National Historical Park in Calumet, Michigan, are unchanged in this document.



PROGRAM NEEDS NOT ADDRESSED IN THE CULTURAL RESOURCES MANAGEMENT PLAN / ENVIRONMENTAL ASSESSMENT

Determining Appropriate Treatments and Use of Historic Structures in Wilderness. The park contains significant historic structures and associated historic districts and cultural landscapes in wilderness and potential wilderness designated areas. These resources include historic structures, cultural landscapes, and historic districts at Tobin Harbor, Fisherman’s Home, Crystal Cove, Captain Kidd Island, Johnson Island, Holte Fishery, Bangsund, and several individual historic structures and ruins elsewhere in wilderness. The National Park Service is currently developing a Wilderness Stewardship Plan / Supplemental Draft Environmental Impact Statement (WSP/SEIS) in which the park is describing the impacts of its management of wilderness. Alternatives for the treatment of historic structures, and their associated historic districts and cultural landscapes, in wilderness will be proposed and their impacts analyzed, in the WSP/SEIS and the final decision documented in the record of decision for the Final Environmental Impact Statement. The CRMP/EA will not present alternatives related to treatments of historic structures or their associated historic districts and cultural landscapes in wilderness. However, there are other archeological sites and landscapes that extend both within and outside of wilderness. Some aspects of management of these sites are included in this document but none that would involve impacts to wilderness character or activities not carried out under an existing or future minimum requirements analysis.

Continuation of Existing Special Use Permits and Life Leases. The National Park Service acknowledges the validity and termination conditions of existing special use permits and expired life leases. This plan does not extend or expand life leases. The original agreements would prevail.

Nonhistoric Structures. Within the park there are nonhistoric structures in designated and potential historic districts and cultural landscapes. The management and future use of these buildings are not considered in this document because they are not considered as cultural resources or managed as cultural resources.

Impact Topics Retained for Further Analysis

Impact topics represent resources that could be affected, either beneficially or adversely, by implementing any of the proposed alternatives. The National Park Service used an interdisciplinary review process as well as existing studies and data to determine which resources would likely be affected by this project. The following topics were carried forward for further analysis in this environmental assessment:

- Archeological resources
- Historic structures and associated cultural landscapes
- Ethnographic resources
- Visitor use and experience

Impact Topics Considered but Dismissed from Analysis

The following topics were evaluated to determine if any environmental issues existed that would require full analysis; however, none were identified, and the following topics were dismissed from further analysis in this CRMP/EA. A brief rationale is provided for each dismissed topic.

Wilderness Character. Approximately 99% of the lands of Isle Royale National Park are designated by Congress as wilderness. Wilderness character is the combination of biophysical, experiential, and symbolic ideals that distinguishes wilderness from other lands. The WSP/SEIS process is expected to be completed at a future date. There are historic structures and associated historic districts and cultural landscapes within wilderness and potential wilderness for which the CRMP/EA does not address management, specifically, management associated with the retention, treatments, and public or administrative uses of historic structures in wilderness. These proposed treatments and management actions will be fully analyzed in the WSP/SEIS and the final decision documented in the record of decision for the supplemental environmental impact statement.

There are other cultural resources in wilderness and potential wilderness whose management is considered as a part of the CRMP/EA, including archeological sites and their associated landscapes and traditional cultural properties that encompass the entirety of the park. The CRMP/EA proposes some actions for these resources that could affect wilderness, but the impacts on wilderness character would be minimal and would be associated with the maintenance of fencing for visitor safety, hand clearing of vegetation, and archeological surveys and investigations. Some of these actions could constitute a prohibited use, a Wilderness Act 4c violation, and would be subject to the minimum requirements analysis process. In addition, NPS *Management Policies 2006* (section 6.3.5) require a minimum requirements analysis for any action that has the potential to impact wilderness character, resources, or values. Prohibited uses may take place in wilderness if the action is taken for the purpose of wilderness and is the minimum tool necessary to accomplish that purpose. A minimum requirements analysis is not being completed at this time because it is unknown if or when any of these prohibited uses would be employed. If a prohibited use is determined necessary for implementation, a minimum requirements analysis would be completed before any action is taken.

For these reasons, wilderness character was dismissed from further analysis in this document.

Museum Collections. The museum collection at Isle Royale National Park includes thousands of objects of cultural and archeological provenance as well as natural resource materials such as plants and animals or animal “parts,” such as moose bones and antlers. The vast majority of the collection is curated on the mainland. The alternatives include potential exhibits of museum objects and opportunities to move and improve storage arrangements. Under all alternatives, museum collections would continue to be acquired, accessioned and cataloged, preserved, protected, and made available for access and use according to NPS standards and guidelines and in consideration of the 2012 Multi-park Collection Management Plan, which includes Isle Royale collections. There are no adverse impacts to museum collections anticipated as a result of the alternatives. Therefore, this topic was dismissed from further analysis.

Impacts to Cultural Resources Associated with Inventory, Evaluation, and Documentation. Many of the actions proposed in this CRMP/EA involve prioritizations of historic property inventories (including archeological survey), evaluations and National Register of Historic Places nominations, documentation, and research studies. These activities represent best management practices and although on occasion they can result in impacts to other resources, they are generally considered to provide only positive impacts to historic properties and cultural resources. These beneficial impacts are mostly associated with secondary effects of better understanding of resources, which provides for better management, better decision making, and more opportunities for interpretive activities. Therefore, this topic was dismissed from further analysis.

Soils and Vegetation. Some of the actions proposed in this CRMP/EA, including vegetation removal around historic structures and landscape features, preservation actions for historic structures, construction of new facilities, and scientific research activities could affect soils and vegetation in a few localized areas. Although some native plants could be lost at specific sites because of actions in the alternatives, no appreciable changes would be expected to occur to the park’s vegetation communities. Likewise, no changes in population numbers, distributions, or reproduction would be expected that would result in the loss of a species or a noticeable reduction of a plant population in the park because of actions being considered in the CRMP/EA. No increases in nonnative plant species would be expected as a result of this document. The actions proposed in this CRMP/EA would result in minimal changes to park’s topsoil. Thus, this topic was dismissed from further consideration.



Sensitive Shoreline Habitat. Isle Royale’s shorelines are some of the park’s most biologically diverse and special places, providing habitat for vertebrates such as chorus frogs, invertebrates such as dragonflies, and a variety of distinctive plants. In particular, the cliffs, rocky shorelines, and splash and rock pools along the shorelines harbor many of the park’s rare and threatened and endangered plant species and are very sensitive to disturbance. The alternatives direct historic preservation work and archeological surveys, some of which would occur along shorelines. Biological surveys would be conducted before work, and sensitive areas would be

flagged to ensure that impacts to sensitive habitats are avoided or minimized. With careful monitoring and staff/researcher education efforts, none of the actions proposed in the alternatives would be expected to have more than a minimal adverse impact on these habitats. Therefore, this topic was dismissed from further consideration.

Terrestrial Wildlife (excluding Federal and State Listed Species). None of the alternatives in the CRMP/EA are expected to noticeably alter terrestrial wildlife populations or habitats in the park. The actions being proposed would not result in habitat fragmentation; habituation of wildlife to people; or changes in population numbers, distributions, or reproduction, that would affect the viability of a population or its habitat in the park. There may be some short-term displacement of wildlife in localized areas as a result of temporary construction activities, but this would not noticeably affect the park's wildlife populations. Thus, terrestrial wildlife as an impact topic was dismissed from further analysis.

Northern Long-Eared Bat (*Myotis septentrionalis*). This federally threatened species likely does not roost in historic structures, and no critical habitat for this bat is designated in the park. Therefore, actions of the CRMP/EA would not likely affect the northern long-eared bat. Informal consultation, as required under section 7 of the Endangered Species Act, has occurred with the US Fish and Wildlife Service to ensure the actions proposed in this document would not adversely affect the northern long-eared bat (see the consultation section in chapter 4). Thus, the northern long-eared bat was dismissed from further consideration.

Peregrine Falcon (*Falco peregrinus*). The Michigan Department of Natural Resources lists the peregrine falcon as endangered in the state. Peregrine falcons nest in the cliffs on Passage Island. The alternatives in this CRMP/EA call for treatment actions that would affect the Passage Island Lighthouse and thus potentially could affect the nesting peregrine falcons. However, maintenance and other proposed treatment actions would occur when the peregrines are not nesting, likely at the end of the nesting season. Because impacts on the birds should be avoided, this topic was dismissed from further consideration.

Other State and Federally Listed Threatened and Endangered Species and Critical Habitat. The endangered gray wolf (*Canis lupus*) is another federally listed species known to inhabit Isle Royale. No critical habitat is present. In addition to the peregrine falcon, other state listed threatened animal species on Isle Royale include merlin (*Falco columbarius*) and common loon (*Gavia immer*). Neither the wolf nor any of the state listed wildlife species are likely to be affected by the alternatives proposed herein; most of these species do not occur in the areas that would be affected by the proposed actions. Any impacts on these species would mostly be avoided by conducting appropriate surveys, avoiding actions that might adversely affect these species, and mitigation measures such as taking action when the species are not present on the island. No loss of important habitat, such as key breeding or foraging areas, would be expected, and no changes would be expected in population numbers, reproduction, or distributions that would measurably alter these species populations or habitats in the park. Any impacts that could occur because of actions in this document would be highly localized and short term, affecting the behavior of only a few individual animals, and have a minimal impact on the species populations and their habitats.

Because many of the listed wildlife and plant species are not present in the areas that would be affected by the actions in this CRMP/EA and because impacts would be avoided by conducting surveys ahead of any actions, this topic was dismissed from further consideration.

Traditional Native Plants. Native peoples have retained the integrity of their relationship to Isle Royale (Minong). Members of the Grand Portage Band continue to use the island's natural and built resources, such as fishing grounds, docks, and trails, and believe the island has spiritual qualities and associations, particularly its plants. Historically, Grand Portage people targeted a variety of native plants for traditional and cultural use. Some of these include cedar, pipsissewa, devil's club, Jack in the Pulpit, Solomon's Seal, sugar maple (*aninnaatig*), blueberry (*miin*), yarrow (*adjidamo'anuk*), bloodroot, wild ginger, and wild sarsaparilla (*bebamabik'*). Some members deem traditional plants to be particularly potent and larger than usual because of the island's unique climate. The undeveloped and insular quality of the park has protected conditions that favor the growth of native plants. Currently, the park compendium allows only the collection of berries, as no agreements between the park and tribes have been created under the new rule allowing collection activities for traditional use (81 FR 45024), but tribes remain concerned with the wellbeing of native plants on Minong because of their traditional importance. The majority of the plants of concern are located in backcountry settings and not threatened by any proposed actions in this CRMP/EA. In addition, any impacts on these plant species would be mostly or entirely avoided by conducting surveys in advance of any removal of vegetation. There would be no expected loss of any individual plants with traditional value as a result of actions proposed in this document. For this reason, the topic was dismissed from further consideration.

Wildlife associated with Demonstration Fisheries. The preferred alternative proposes establishing a demonstration fishery for interpretive purposes. Inland fisheries at the park are managed under the sole jurisdiction of the National Park Service. However, because Lake Superior fisheries are co-managed with the State of Michigan, the National Park Service would first consult with the Michigan Department of Natural Resources to determine if this activity would be permitted by the state. Such a fishery would be a small operation, primarily focused on lake trout and possibly whitefish and/or herring, operated under a permit to the park regulated by the Michigan Department of Natural Resources under their assessment fisheries program. This program allows for small harvests associated with fisheries research and population assessments. Harvest levels would be determined through participatory consultation between state and federal biologists and managers. Although there would be some impact from harvesting fish in a localized area, with a limited harvest and careful monitoring of the operations, impacts of the fishery should be minimal. Details of this activity, including number of fish harvested, time and length of operation, and number of permitted fishermen, are beyond the scope of this CRMP/EA; without these details, it is not possible to assess the biological impact of the proposed fishery. A future implementation plan would specifically address the demonstration fishery and the biological impact of this fishery would be assessed at that time. Thus, this impact topic was dismissed from further consideration.

Treaties, Tribal Rights, and Sacred Sites. Although treaty rights are beyond the scope of this document, any actions taken to implement this CRMP/EA would conform to laws regarding treaty rights. The National Park Service would continue to routinely consult with tribes having treaty rights and their representatives on a government-to-government basis. None of the actions proposed in this document would in any way alter government-to-government relations between the region's tribal nations and the United States of America. Likewise, none of the proposed actions would alter existing treaty rights or agreements between the United States of America and tribes.

Socioeconomic Environment. Isle Royale is a destination park with no major gateway communities, and none of the actions in the alternatives would substantially alter visitor use levels or visitor use patterns and thus would have a minimal effect on local businesses or local residents. Likewise, none of the alternatives would have more than a minor effect on local demographics, services, housing, or employment. Furthermore, the alternatives do not include any substantial facility construction. Therefore, this impact topic was dismissed from further consideration.

Environmental Justice. While local residents include minority and low-income populations, these populations would not be particularly or disproportionately affected by activities associated with the construction or implementation of the alternatives. In addition, the park staff and planning team solicited public participation as part of the planning process and equally considered all input from persons regardless of age, race, income status, or other socioeconomic or demographic factors. When considering the implementation of the alternatives, there would be no identifiable adverse human health effects, therefore, there would be no direct or indirect adverse effects on any minority or low-income population. Lastly, implementation of the alternatives would not result in any identified effects that would be specific to any minority or low-income community. For all of these reasons, the issue of environmental justice was considered and dismissed from further analysis.

Indian Trust Resources. There are no Indian trust resources at Isle Royale National Park. The lands comprising the park are not held in trust by the Secretary of the Interior for the benefit of Indians because of their status as Indians. Therefore, the impact topic of Indian trust resources was not retained for further analysis.

Chapter 2

ALTERNATIVES





CHAPTER 2: ALTERNATIVES

Introduction

This chapter presents three alternative approaches to managing the cultural resources of Isle Royale National Park. Alternative A, which describes a continuation of current management, the NPS preferred alternative (alternative B), which provides for expanded treatment, research, and interpretive opportunities for the park’s resources, and alternative C, which focuses on resource protection and archeological and ethnographic research, with less emphasis on development and adaptive use of historic structures. The alternatives were developed by soliciting input from park staff, stakeholders, other government agencies, and the public on key issues and desired resource conditions and visitor experiences. Alternative development also included facility cost estimates, considerations of potential funding sources, and the park’s obligation to reduce its deferred maintenance backlog.

Additionally, the following alternatives discussions include documentation, inventory, and monitoring efforts or other implementation level plans that the park staff will pursue in order to continue to increase knowledge and understanding of the resources. Day-to-day maintenance and research activities have little potential for environmental impacts and do not require an environmental assessment in order for the park to pursue but are sometimes included within the alternative descriptions to provide a holistic picture of the intended cultural resource management of the park. Other “best practice” activities that manage cultural resources but do not pose threats of environmental impact and do not require analysis in an environmental assessment are included in appendix A and can be considered as potential actions associated with any alternative implemented.

The park will continue to meet the requirements of section 110 of the National Historic Preservation Act to identify national register eligible properties and pursue formal nominations, with a focus on underrepresented cultural resources on the island. For the purposes of this CRMP/EA, all previously unevaluated resources that are over 50 years old and included as part of an existing thematic context study will be considered eligible for the National Register of Historic Properties. A list of priority documentation and research needs are included in appendix B.

The alternatives in this CRMP/EA are intended to enable managers and the public to consider different approaches to managing visitor use, directing development, providing access, and avoiding potential conflicts that may arise with the cultural resources of the park. In some cases, specific historic property treatments are referenced. These treatment definitions can be found in appendix C. Each alternative includes a summary or concept statement, followed by management actions that would be taken under that alternative. Management actions under each alternative are grouped under the types of cultural resources present at Isle Royale. The chapter then describes the mitigation measures that would be taken to reduce the intensity of impacts under the action alternatives.

Actions Common to All Alternatives Including the No Action

Actions and activities described in this section of the CRMP/EA are common to all of the alternatives presented in the following sections, including the no-action alternative. These actions also have no potential for significant environmental impacts, have already been the subject of a National Environmental Policy Act (NEPA) analysis, or are so remote and speculative in impacts that they cannot be meaningfully evaluated at this time. Therefore, while these actions are part of the CRMP/EA, they will not be discussed further in the environmental consequences of the document.

In addition, conversion of potential wilderness areas to designated wilderness and cultural resource management within these areas will be addressed in the future WSP/SEIS. Treatment and management of historic structures and installations in wilderness or potential wilderness are not analyzed as a part of the CRMP/EA. Specifically, these resources include the components of the historic landscapes in Tobin Harbor, Fisherman’s Home, Crystal Cove, Captain Kidd Island, the Anderson Fishery at Johnson Island, the Holte Fishery, the research station on Bangsund Island, the three potentially historic fire towers, the park’s historic cemeteries, components of historic mines in wilderness, and several isolated structures and potentially historic installations in wilderness.



INTERPRETATION

Numerous interpretive opportunities were identified during the development of the CRMP/EA. These activities may be incorporated into the current interpretive programming to supplement visitor opportunities or may be considered as part of a broader interpretive planning effort (appendix D). These interpretive activities are not park actions that need to be analyzed through a NEPA document and may be implemented at the park's discretion if staffing and funding is available.

DOCUMENTATION

The National Park Service is obligated by the National Historic Preservation Act (NHPA) [section 110 (a)(2)], and Executive Order 11593, to identify, evaluate, preserve, and protect historic properties. Under any alternative, the National Park Service would continue to inventory and evaluate historic properties in the park. National register nominations would be prepared for potentially eligible resources, as would National Historic Landmark nominations for potentially eligible resources and cultural landscape inventories and reports for sites where they are needed. Archeological inventories would continue as resources are available. Priority would be given to locations where: (1) the potential for archeological resources is high and (2) surveys have been undertaken but additional study would contribute to research and interpretation. Isle Royale's inventory of archeological sites would continue to be monitored and assessed as prescribed by the NPS Midwest Region's Site Condition Assessment and Ranger Monitoring Programs.

TRAILS AND HISTORIC ROADS

Trails throughout the park would be inventoried and researched to determine their origins. Many segments of historic trails, wagon roads, and remnants of historic logging activities (National Park Service, Midwest Archeological Center, trip report) now serve as hiking paths. The park would work to identify these routes and manage modern hiking trails to stay within them. The history of the historic routes would be interpreted to visitors with static waysides where appropriate.

HISTORIC STRUCTURES

Isle Royale is a dynamic environment threatened by natural disasters. Following *NPS Management Policies 2006* (section 5.3.5.4.10), historic structures damaged or destroyed by fire, storm, earthquake, war, or any other accident may be preserved as ruins; be removed; or be rehabilitated, restored, or reconstructed. Structures are included as components of the historic mining; recreational resorts and cottages; folk and commercial fisheries; lighthouses and navigational aids; and the Civilian Conservation Corps, Mission 66, and other NPS infrastructure sections described below.

Many historic properties within the park associated with post-European settlement include functional docks. In the process of completing National Register of Historic Places documentation, docks would be considered as contributing features and preserved if their current design and structural elements date to the periods of significance of their associated properties. In the interim, all current docks (which are not located in wilderness) will be maintained.

PRECONTACT AND HISTORIC MINING

All historic mining shafts at Daisy Farm, Rock Harbor, and Windigo would be evaluated for visitor and staff safety, and modifications for increased safety would be made when necessary. Existing fences around historic mine shafts near Rock Harbor would be maintained for visitor safety. Vegetation would continue to be cleared around mine shaft fencing.

One of the historic Wendigo Company wagons would be preserved under a shelter constructed at the Windigo site, it would be maintained as part of the park's interpretive collection.



SHIPWRECKS

All shipwrecks would be monitored intermittently and the mooring buoys would be maintained to support diving for recreation and study.

CEMETERIES AND BURIAL SITES

Management actions, including vegetation management and maintenance of fencing, associated with the known cemetery sites will be described in the future WSP/SEIS. New interments would not be permitted at the island-based cemeteries or other locations within the park.



RECREATIONAL RESORTS AND COTTAGES

Conversion of potential wilderness areas to designated wilderness and cultural resource management within these areas will be addressed in the wilderness stewardship plan. Treatments and management of buildings, structures, and sites in wilderness or potential wilderness are not analyzed as a part of this CRMP/EA.

The expired agreements for private use of historic recreational cabins (special use permits of 1977) would not be renewed. Existing VIP agreements issued to individual former life-lease family members during the development of the CRMP/EA would end.

For cabins in nonwilderness areas, such as the Farmer cabins at Rock Harbor and those at Washington and Barnum Islands, the National Park Service would pursue a number of different options for adaptive reuse. These include administrative, Artist-in-Residence programs, and interpretive and educational programs. The Spruces Cabin, located at Rock Harbor, would continue to be preserved and maintain an administrative or interpretive use.

Historic noninvasive vegetation would be allowed to remain and be maintained at recreational resort and cabin sites. These locations would be monitored to prevent the spread of noninvasive plant species. Structural fire prevention may involve the removal of vegetation within a specified distance from historic structures. Any proposed removal of vegetation contributing to a cultural landscape for the prevention of structural fire would be subjected to additional consultation and compliance process.

FOLK AND COMMERCIAL FISHERIES

Conversion of potential wilderness areas to designated wilderness and cultural resource management within these areas will be addressed in the WSP/SEIS. Treatments and management of buildings, structures, and sites in wilderness or potential wilderness are not analyzed as a part of this CRMP/EA. However, docks in nonwilderness would be retained for access.

Upon expiration, the existing agreements for private use of folk and commercial fisheries (special use permits of 1977) would not be renewed, although the National Park Service would seek a variety of partnerships and opportunities for cooperation with local communities, government agencies, nonprofit organizations, and other entities that may have an interest in helping to achieve management and treatment actions.

Historic noninvasive vegetation would remain at fishery sites. These locations would be monitored to prevent the spread of noninvasive plant species. Structural fire prevention may involve the removal of vegetation within a specified distance from historic structures. Any proposed removal of vegetation contributing to a cultural landscape for the prevention of structural fire would be subjected to additional consultation and compliance process.

VERNACULAR BOATS

Vernacular boats island-wide would be evaluated for opportunities for preservation and National Register of Historic Places eligibility. If a vessel is determined to have lost integrity, it would be documented (field measurement and boat biographical research) and allowed to deteriorate. Vernacular boats that are left behind by owners upon the expiration of special use permits would be similarly evaluated for National Register of Historic Places eligibility and preserved or documented in place and allowed to deteriorate, based upon their level of integrity.

Periodic preservation treatment would be provided to John Linklater's birch-bark canoe. The canoe would continue to be stored in a museum facility, or a visitor destination in nonwilderness may be adapted to appropriately store and interpret the canoe to the public. The use of the canoe would be documented, with particular focus on Linklater's time on Isle Royale and Milford Johnson's intermittent use.



LIGHTHOUSES AND NAVIGATIONAL AIDS

The US Coast Guard would continue to own and maintain the historic Blake Point Light as a navigational aid. The Rock Harbor lighthouse would continue to be used as an interpretive site, including occasional tours. The interpretive exhibits would be maintained.

CIVILIAN CONSERVATION CORPS, MISSION 66, AND OTHER NPS INFRASTRUCTURE

National Register of Historic Places eligibility evaluations would be completed for historic structures that have not previously been documented, including the Malone Bay Ranger Station, Bangsund Fishery, Siskiwit River Bridge, Mission 66-era resources, fire towers, and moose exclosures. Administrative use of Mission 66 structures in nonwilderness would continue. The Malone Bay Ranger Station would continue to be maintained. The two moose exclosures located in nonwilderness would continue to be used for interpretation and education.

ETHNOGRAPHIC USE AND RESOURCES

The National Park Service would engage in ongoing consultation with traditionally associated tribes and traditionally associated Scandinavian-American fishers to identify traditional cultural sites, traditional water routes, archeological sites, ethnographic sites, ethnographic landscapes, ethnographic resources, cultural practices, and other culturally significant elements. Access would be granted to ensure the continuation of cultural practice and lifeways and to accommodate Ojibwe traditional use of the island to the extent possible per law and policy. However, any designation or future designation of a traditionally associated people does not confer the right to occupy any particular historical structure as a private residence. Occupancy and use of historic structures will be based upon the objectives of the management of the property (i.e., for cultural demonstrations, education, interpretation, discovery, or overnight visitor use) as guided by NPS policy.

The park would reference the recently completed traditional cultural property documentation and national register eligibility evaluation of Ojibwe ethnographic resources during park planning and management and would work to protect sensitive information included in these documents.



MUSEUM OBJECTS

The park would support the development of the Lake Superior Collections Management Center, a unified museum collection management and storage facility that would include the collections of Isle Royale, Keweenaw National Historic Park, and Pictured Rocks National Lakeshore. Museum collections would be moved from the island and the Houghton storage facility to the new facility in Calumet, Michigan, when it is completed.

Alternative A (No Action Alternative)

Alternative A represents the continuation of ongoing management of cultural resources within Isle Royale National Park.

PREHISTORIC AND HISTORIC MINING

No additional actions would occur to the management of archeological resources associated with historic mining besides those common to all alternatives. Precontact mining archeological resources, including the Minong Mine Historic District in McCargoe Cove, would continue to be documented as funding and staffing allow and efforts would continue to identify and inventory additional sites. Monitoring and documentation efforts at historic mining sites would continue and existing fences around historic mine shafts would be maintained for visitor safety. Mining features in more remote locations would continue to be documented and monitored, but no hazard mitigation would be done at these sites.



SHIPWRECKS

No additional changes would occur to the management of submerged archeological resources associated with shipwrecks and other cultural sites besides those common to all alternatives. Monitoring and documentation efforts would continue when staffing and resources are available.

CEMETERIES AND BURIAL SITES

No additional actions would occur to the management of cemeteries and burial sites besides those common to all alternatives.

RECREATIONAL RESORTS AND COTTAGES

Day to day preservation and management of historic resorts and cottages in nonwilderness areas would be similar to that described in the common to all alternatives. The Rock Harbor Guesthouse would continue to be preserved and used for administrative and interpretive purposes, as would the Farmer Cabins and Spruces Cabin. Barnum and Washington Islands are located in the frontcountry management zone, as indicated in the park general management plan; however, there is no formal prescription for management to implement the frontcountry treatment and hands-on management of the area would continue to be undertaken by volunteers whose families are affiliated with the islands.

FOLK AND COMMERCIAL FISHERIES

As mentioned above, Washington Island is located in the frontcountry management zone, but there is no formal prescription for management to implement the frontcountry treatment, and hands-on management of the area is often undertaken by volunteers whose families are affiliated with the islands.

The Edisen Fishery would continue to serve as an interpretive fishery for park visitors to learn about folk fishermen associated with Isle Royale and their lifeways. The National Park Service would continue to actively manage the site by maintaining and preserving buildings and associated features in their current form and would work to complete a historic structures report and cultural landscape report.

VERNACULAR BOATS

No additional actions would occur to the management of vernacular boats owned by the National Park Service. The *Tern*, currently undergoing restoration, would be returned to Mott Island, and the *Belle* would continue to deteriorate.

LIGHTHOUSES AND NAVIGATIONAL AIDS

The exterior building envelope of the Rock of Ages Lighthouse and Rock Harbor Lighthouse would continue to be maintained with only basic stabilization work to prevent future deterioration. No work on the Rock of Ages dock would be undertaken.



The US Coast Guard would continue to own and maintain the Isle Royale Lighthouse, the Passage Island Lighthouse, and the Blake Point Light. The National Park Service would participate in efforts led by the General Services Administration to identify a nonprofit or other government agency (potentially including the National Park Service) to accept ownership of the lighthouses under provisions of the National Historic Lighthouse Preservation Act. No visitor access would be anticipated for US Coast Guard-owned lights.

CIVILIAN CONSERVATION CORPS, MISSION 66, AND OTHER NPS INFRASTRUCTURE

No additional actions would occur to the management of these resources. As time, staffing, and funding allows the park would complete National Register of Historic Places determinations of eligibility for historic buildings that have not yet been evaluated to guide future management actions and continue to use buildings in nonwilderness for administrative, educational, and interpretive purposes.

ETHNOGRAPHIC USE AND RESOURCES

No additional actions would occur to the management of ethnographic use and resources. The park would continue to engage in consultation with traditionally associated tribes and traditionally associated Scandinavian fishers to identify important sites and resources, document ethnographic resource and landscape studies, and guide ethnographic resource management.

MUSEUM OBJECTS

No additional actions would occur to the management of museum collections. Future park collections would follow the current scope of collections statement.

Actions Common to Alternatives B and C

Actions and activities described in this section of the CRMP/EA are common to both alternatives B and C.

PRECONTACT AND HISTORIC MINING

Trails that impact archeological sites would be rerouted, and the park would complete cultural landscape inventories and cultural landscape reports to guide management and preservation, as needed. The Ransom smelter at Daisy Farm would be targeted for a higher level of documentation, preservation, and on-site interpretation.

RECREATIONAL RESORTS AND COTTAGES

As described in the common to all alternatives, most historic structures at Rock Harbor, including the Farmer Cabins and the Spruces Cabin, would continue to be preserved and maintained for administrative or interpretive use.



Virtual and offsite interpretive opportunities regarding the preservation of wilderness character, structures in wilderness, and the history of structures and sites located in more hard to reach wilderness settings would be created. Physical infrastructure for this interpretation (waysides) would be constructed in nonwilderness settings.

The cultural landscapes and historic structures at Barnum Island and Rock Harbor would be

protected. Both locations are heavily visited and include areas where future infill of facilities for both interpretation of park history and visitor service needs could occur. Infill refers to the potential to construct new structures, or relocate existing structures, to areas within a historic district in a means complimentary to the historic feel of the district or, minimally, such that the historic feel of the district is not compromised. Future placement of new or relocated buildings may occur at Rock Harbor (in or adjacent to the developed front country area) or at Barnum Island. All infill would be guided by completed and evaluated cultural landscape reports.

Preservation work on recreational cabins (as well as at fishery sites) may result in opportunities to salvage and reuse historic materials. The park would designate a storage area on Mott Island or in an existing facility at another location in nonwilderness to keep architecture salvage materials (e.g., flooring, siding, windows, etc.) for potential reuse for future resort and cabin maintenance needs.

FOLK AND COMMERCIAL FISHERIES

The National Park Service would evaluate fisheries for eligibility on the National Register of Historic Places as historic resources and traditional cultural properties and determine if they merit a multiple property National Historic Landmark designation. Any new development would be located to minimize harm to the potential designation.

New development at Washington Island designed to interpret folk and commercial fisheries of Isle Royale, including those located elsewhere in wilderness settings, could include interpretive programming, and new waysides.

VERNACULAR BOATS

Vernacular boats associated with the Washington Island fisheries would be documented, and one or more boats would be stabilized to promote visitor experiences.

LIGHTHOUSES AND NAVIGATIONAL AIDS

The park would work with the US Coast Guard to transfer Isle Royale Lighthouse and Passage Island Lighthouse ownership to the National Park Service. The exterior of the Isle Royale Lighthouse would continue to be maintained while the National Park Service identifies stabilization needs and completes a HABS level drawing of the structure. The Passage Island Lighthouse would undergo exterior stabilization and be maintained while the National Park Service identifies preservation partners. The National Park Service would work with the US Coast Guard for environmental remediation activities associated with the lighthouses in advance of their transfer.

Lighthouse preservation relies on partnerships. If partnerships cannot be identified, actions could be delayed, and the National Park Service would provide basic stabilization in the interim.

CIVILIAN CONSERVATION CORPS, MISSION 66, AND OTHER NPS INFRASTRUCTURE

Management of unevaluated, but potentially historic, structures associated with the more recent history of the park would continue as if the sites were historic. Determinations of eligibility for listing on the National Register of Historic Places would be prepared for such structures, and if eligible, nominations would be sought. Any future preservation treatment activities would be informed by recommendations from historic structures reports, cultural landscape reports, and/or other studies.

ETHNOGRAPHIC USE AND RESOURCES

Ethnographic resources and sites would be documented and monitored. Documentation of ethnographic knowledge would continue and traditional knowledge bearers would be consulted and encouraged to collaborate with the park for interpretive materials and cultural demonstrations.

MUSEUM OBJECTS

There are historic structures within the park in both wilderness and nonwilderness that are privately occupied. Some of these structures contain personal property that could fit the park's scope of collection. The National Park Service would work with departing occupants to secure donations of appropriate materials to be included in the park's collection. In other situations, objects may be acquired through field collection. Before removing any museum objects from structures, they would be photographed and recorded in situ. All photos and records would become part of the park's museum collection. If objects are still private property, permission would be sought to photograph and record objects in situ.

Alternative B (NPS Preferred Alternative / Proposed Action)

Alternative B seeks to preserve and provide proactive stewardship of the full range of cultural resources at Isle Royale and to ensure appropriate management of fundamental resources and values. The alternative emphasizes and depends strongly upon a vibrant program of partnerships intended to help the National Park Service preserve historic properties reflecting the entire scope of human history at Isle Royale. The NPS preferred alternative relies heavily on preservation partnerships, particularly for actions associated with historic structures; if partnerships cannot be identified, actions could be delayed, and, in the interim, the National Park Service would provide basic stabilization and maintenance for buildings, including winterizing and maintaining a weather-tight structural envelope.

Proposed partnerships could take many forms. The park would work with American Indian tribes to develop partnerships that enhance or revive their long relationship with Isle Royale (for example, by developing cultural educational opportunities). Other partnership opportunities with organizations associated with members of former life lessee families who have helped to maintain historic buildings and structures would be expected. Official partnerships would be created and administered under NPS agreement policies that would specify roles and park priorities and guidelines for historic preservation.

See Appendix E for more information on Isle Royale preservation partnership guidelines.

KEY ELEMENTS OF ALTERNATIVE B

- Establishment and reliance upon a robust partnership program to aid implementation of alternative actions.
- Emphasis on restoring cultural landscapes and providing additional visitor opportunities.
- Enhanced interpretation of historic mining sites.
- Infrastructure additions and adaptive reuse of historic structures and cultural landscapes on Barnum and Washington Islands.
- Restoration of the historic Rock Harbor Guesthouse to functionality as a hostel.
- Restoration and interpretation of the *Tern* and *Belle* boats.
- Enhanced efforts to catalog vernacular boats as museum property and develop display opportunities.
- Re-establishment of a demonstration fishery at the Edisen Fishery.
- Restoration of the landscapes, exteriors, and interiors of the Isle Royale Lighthouse, Passage Island lighthouse, and Rock of Ages Lighthouse and encouragement of visitor access.
- Exterior and landscape rehabilitation of the Rock Harbor Lighthouse.

DOCUMENTATION

Documentation activities and studies are not actions that could cause significant impacts to park resources and may be implemented at the park's discretion if staffing and funding is available. Under alternative B, the park may undertake any or all of the research and inventory efforts identified in appendix B, or any other additional studies and documentation as park resources become available. Impacts associated with these studies and activities are not analyzed further in this CRMP/EA.



PRECONTACT AND HISTORIC MINING

Research efforts would focus on known information gaps in Isle Royale's archeological record. For precontact settings, which are emphasized in the park's enabling legislation, increased archeological inventories would be performed within the island interior, along relic shorelines, and in areas where private use agreements have precluded adequate study. Additionally, expanded research on regional contexts and paleoenvironments would be performed.

Onsite interpretation of mining resources located in nonwilderness would increase, including those features closest to Windigo. These interpretive enhancements would include waysides, brochures, and both in-person and virtual interpretive programming. At the Minong Mine site in McCargoe Cove, a hand-hewn log interpretive cabin would be built in a setting outside of wilderness to provide on-site interpretation of the mine. Interpretation of mining resources within wilderness, including resources at Wendigo Copper Company, Island Mine, Minong Mine, and Pittsburg & Isle Royale Mine, would also be developed consistent with the wilderness setting (i.e., brochures, self-guided tours, downloadable cell phone tours, and virtual presentations).

SHIPWRECKS

Under alternative B, there would be an increased emphasis for shipwreck documentation, monitoring, and interpretation. The park would prepare a documentation and monitoring plan that includes use of an array of modern technology, such as remotely operated underwater vehicles, digital scans, LiDAR, and 3-D imaging. Experimental shipwreck stabilization would be considered, and guided dive tours would be used to promote visitor access. Additional opportunities for interpretation would be offered through guided tours, digital media, interactions with NPS divers via remote live video feed, and remotely operated vehicles.

RECREATIONAL RESORTS AND COTTAGES

The resort and recreational structures and landscapes at Barnum Island would be rehabilitated. These rehabilitations would include converting six cabins to interpretive exhibit space, workshops, overnight lodging for educational program participants, a storm shelter, and housing for caretakers, educational program staff, or maintenance crews. The rehabilitated structures would then be used by the park to support day use educational opportunities focused on sailing or traditional boatbuilding and native youth programming. Through a variety of agreement mechanisms, classes would address traditional skills, such as the history and tradition of vernacular boatbuilding and native plant identification. Agreements could involve folk schools, nonprofit organizations, and tribes.



The historic Johns Hotel and Johns Cabin would be restored and used for interpretive exhibits. Historic Structure Reports would be prepared for buildings rehabilitated for adaptive use. These reports, along with an exhibits plan and design, and potentially a historic furnishings report, would guide preservation treatments of the buildings. The park would seek partnerships to develop planning documents and interpretive exhibits for the Johns Hotel.

Under this alternative, the Rock Harbor Guesthouse would change from administrative use to public use and would be restored to its historic function as a public lodging facility. The restored structure would operate as a hostel, offering mid-range overnight accommodations, serving the backpacker market, and offering park visitors reduced cost alternatives and variety in overnight accommodations in the park. Restoration work would be guided by a historic structure reports.

Day use visitor opportunities, such as the development of interpretive walking trails and installation of picnic and pit toilet facilities, would be provided on Barnum Island. Some form of public transportation between Barnum and Washington Islands, such as rowboats kayaks and canoes, would be provided as part of a guided interpretive experience. The historic Barnum dock and boathouse dock would be stabilized and interpreted. Non-historic temporary docks would be removed. A permanent accessible dock would be constructed near the east end of Barnum Island and may incorporate a reconstructed boat house once present here to facilitate interpretive exhibits. The installation of new features on Barnum Island would be guided by a cultural landscape report. Nonhistoric buildings would be removed from the landscape. Historic privies would be stabilized and preserved, but their functionality would be discontinued.

FOLK AND COMMERCIAL FISHERIES

Assessment fishery permits would be sought from the State of Michigan. Assessment fisheries would operate from Washington Island and the Edisen Fishery and would have a scientific assessment, recreational, and/or cultural emphasis. The fishing operation under the assessment permit would serve as a demonstration fishery to interpret the new fishing operation and activities associated with the fisheries that historically operated in the park to the public.

Washington Island. The National Park Service would establish a small-scale assessment fishing operation, provide overnight visitor cabin rentals, and provide day use visitor opportunities on Washington Island.

To support fishing operations, the Sivertson fish house, net house, and cabin would be rehabilitated, the Eckel fish house and the Eckmark net house would be preserved, and net drying reels would be reconstructed. The three other cabins on Washington Island would be rehabilitated. Historic Structure Reports would be prepared for buildings rehabilitated for adaptive use.

Some small-scale landscape features would be restored to increase interpretive and educational opportunities. Interpretive walking trails emphasizing historic themes would be established. A day use picnic area with picnic tables and vault toilet would be provided near the former site of the historic Singer Hotel. An accessible dock would be constructed. The trail from the dock to the Sivertson Fishery would be improved to meet Architectural Barrier Act standards.

A trail from the Sivertson dock to the historic Singer wireless antenna tower and Sunset Rock would be maintained. The antenna tower would be preserved and interpreted. The primary view from Sunset Rock to the north and west would be maintained by vegetation management. Rare species along the trail would be preserved, and in other locations native plant communities would be allowed to continue to evolve without interruption.

Some method of public transportation between the islands, such as rowboats, kayaks, or canoes would be provided as part of a guided interpretive program.



Edisen Fishery at Rock Harbor.

Under alternative B, the Edisen Fishery would be preserved and used as a place to interpret subsistence and historic commercial fishing culture to the public. A variety of uses would be available, including use and occupancy, educational support facilities, and assessment demonstration fisheries. A cultural landscape report would be completed and the existing draft historic structures report updated prior to any changes in preservation treatment. The park would apply to the state to renew an assessment fishing permit for the location.

Isle Royale fisher or descendants of fishers, having first-hand knowledge of the folk culture and traditional environment of Isle Royale, would be located, recruited, and hired as cultural demonstrators. The cultural demonstrators would work and live at Edisen Fishery to catch, clean, and provide fish to Rock Harbor Lodge, maintain gear and boats, and interpret the site to visitors on tours. Fish could be smoked and the catch brought to Rock Harbor Lodge for consumption.

VERNACULAR BOATS

A historic wooden boat or a reproduction of a historic boat would be used for boat tours and possibly rentals. A boat shelter would be constructed in nonwilderness or an existing structure would adaptively reused at the Farmer Cabin, Edisen Fishery, or the Barnum Boathouse. The boat shelter would house historic and reproduction boats and provide interpretation of them. The restored and seaworthy *Tern* would be put on display and interpreted at Edisen Fishery. The boat could be placed in water and operated as part of the cultural fishery demonstration. The *Belle*, another vernacular boat located at Edisen Fishery, would be minimally stabilized and evaluated for restoration.

LIGHTHOUSES AND NAVIGATIONAL AIDS

The National Park Service would work with partners to complete exterior and interior restoration of the Rock of Ages Lighthouse to allow safe visitor access. Restoration would be guided by historic structure report recommendations. Substantial dock repair or replacement would be completed to improve visitor access to the site.

After the US Coast Guard transfers ownership of the Isle Royale Lighthouse (an action included in all action alternatives), the park would complete a combination historic structure report and cultural landscape report to guide preservation activities and seek out a partnership to maintain the structure. A minimal dock would be constructed to transfer goods and passengers. The interior of the lighthouse would be rehabilitated to provide for overnight visitor use. An overnight lightkeeper-in-residence program would be established to supervise overnight visitor use at the site and conduct day to day maintenance of the lighthouse in the manner of the original keepers.

A combined historic structure report and cultural landscape report would be prepared for the Rock Harbor Lighthouse in preparation for restoring select cultural landscape features associated with the Rock Harbor Lighthouse additional interpretation at the site. The capstan from the Monarch shipwreck on display near the lighthouse would be removed, accessioned as a museum object, and either displayed inside the lighthouse or stored at the park museum storage facility.

Transfer of the Passage Island Light house from the US Coast Guard would be completed. The lighthouse and fog signal building would undergo exterior restoration and interior rehabilitation following a completed historic structure report. A cultural landscape report would be prepared and treatment recommendations would be carried out, potentially including reconstruction of the tramway. Both docks would be retained.

CIVILIAN CONSERVATION CORPS, MISSION 66, AND OTHER NPS INFRASTRUCTURE

No additional actions related to Civilian Conservation Corps, Mission 66, and NPS infrastructure are proposed under alternative B.

ETHNOGRAPHIC USE AND RESOURCES

The park would significantly increase staff efforts to document and understand Ojibwe culture. It would further document the use and importance of Ojibwe fishing at Isle Royale in Ojibwe lifeways. It would complete extensive documentation and monitoring efforts with elders and important knowledge bearers. An Ojibwe culture camp program would be developed that focuses on cultural resources, language, and/or ceremonial practices and subsistence skills.

MUSEUM OBJECTS

The 2016 scope of collections statement may be revised to reflect changing park collection priorities, including preserving significant items related to all cultural resource categories represented at Isle Royale. Increased efforts would be made to identify and conserve objects in the field where significant and practicable. Efforts would be made to support a program designed to recover artifacts previously removed from shipwreck sites by private collectors and accession them into the park's museum collection.

The inventory, cataloging, conservation, and storage of historic vessels would receive high priority as museum objects. These vessels would receive regular monitoring and treatment, as necessary, and stored out of water. Because of the importance of retaining Isle Royale-specific boats in their historic context, a historic recreation boat would be sheltered at the historic Barnum Island boathouse. The building would be rehabilitated to protect and secure the boat.

Alternative C

Alternative C emphasizes research, particularly of archeological and ethnographic resources, and provides for stabilization and preservation of historic and cultural resources in the park. In contrast to alternative B, alternative C provides fewer enhancements to sites and historic structures for interpretation and visitor access. Under the alternative, most effort by park staff would be dedicated to research and documentation, with less focus on providing interpretive experiences or adaptive reuse of cultural resources.

KEY ELEMENTS OF ALTERNATIVE C:

- Emphasis on research and documentation of archeological and ethnographic resources
- Preservation and maintenance of historic structures on Barnum Island, Washington Island and the Edisen Fishery, but little adaptive reuse
- Preservation of the *Tern* and *Belle* vernacular watercraft at the Edisen Fishery.
- Rehabilitation and restoration efforts at Lighthouses limited to exteriors and landscapes; visitor access to the interiors not provided.

DOCUMENTATION

Alternative C emphasizes research and documentation of the park's archeological and ethnographic resources. It is likely that, in pursuing this alternative, the park would have the capacity for additional research and documentation. Documentation activities and studies are not actions that could cause significant impacts to park resources and may be implemented at the park's discretion if staffing and funding is available. Impacts associated with these studies and activities are not further analyzed in this CRMP/EA. Under alternative C, the park may undertake any or all of the research and inventory efforts identified in appendix B, as well as additional focused research on supporting an increased understanding of the park's archeological and ethnographic resources. All documentation produced would become part of the park's museum collection as resource management records.

Examples of additional documentation that would support alternative C's research focus include:

- National Register of Historic Places documentation related to:
 - » Prehistoric copper mining context in the upper Midwest multiple property nomination
 - » Vernacular boats owned by National Park Service
- Archeological surveys and additional research related to:
 - » Coastal settings including Tobin Harbor, Duncan Bay, and various sites along the north shore and to Siskiwit Lake to the west
 - » Wendigo Copper Company town sites and drill shacks
 - » Siskowit Mine, including the submerged historic debris scatter
 - » Locations of boat graveyards; inventory of boat remains onshore and underwater
 - » Submerged cultural resource inventories, including submerged components of terrestrial-based sites, i.e., historic mines
 - » Refuse dumps
- Ethnographic research related to:
 - » How people adapted episodic, seasonal survival skills and patterns of maritime life to the specific island and Lake Superior conditions
 - » Transfer of Ojibwe fishing knowledge and skills into the American Fur Company (1830s) and McCullough fishing operations (1850s) on Isle Royale
 - » Ojibwe fishing techniques and contemporary ethnographic fishing
 - » McCormick's Reef (largest lake trout spawning ground at Isle Royale)
 - » Ojibwe *mowin* (language) place names and practices associated with those place names, such as Siskiwit Bay and Siscowet lake trout
- General research related to historic themes:
 - » Expanded research of regional contexts and paleoenvironments
 - » Precontact use areas
 - » Precise locations of cemeteries and burial sites island-wide
 - » Historic trapping, logging, roads and trails, and other historic activities that are not well defined
 - » Assessment of archeological collections collected from Isle Royale and managed by other institutions for additional information related to the natural and cultural history of the island

PRECONTACT AND HISTORIC MINING

In relation to Island Mine activities, baseline documentation of the Senter Point powder house ruins and steam hoist engine would be completed. No stabilization or vegetation removal would be undertaken at this wilderness resource.

The park would actively look for partners to undertake archeological investigations and field schools related to precontact and historic mining resources.

SHIPWRECKS

No additional actions related to shipwrecks would be taken under alternative C.

RECREATIONAL RESORTS AND COTTAGES

Historic structures and landscapes on Barnum Island would be preserved. Structures would be maintained and protected on the landscape, but minimal access would be provided and no adaptive re-use to support educational and interpretive opportunities, would occur. At Rock Harbor, the guesthouse would continue to be preserved and used for administrative and interpretive purposes, as would the Farmer Cabins and Spruces Cabin.

FOLK AND COMMERCIAL FISHERIES

The buildings at Washington Island would be preserved, guided by historic structures reports. The National Park Service would not implement the interpretive activities proposed in alternative B. However, at both Washington and Barnum Islands, a study would be undertaken regarding the transition from native subsistence to commercial fishing. This would be interpreted onsite via waysides, self-guided interpretive opportunities, or interpretive programming.

No cultural demonstration fishery would be created at the Edisen Fishery. The site could potentially house an Artist-in-Residence or scientific researchers or be used for park administrative purposes. A cultural landscape report would be completed and the existing draft historic structures report would be updated prior to any change in preservation treatment. The National Park Service would actively manage this site by maintaining and preserving buildings and associated features.

VERNACULAR BOATS

The *Tern* and the *Belle*, located at Edisen Fishery, would be restored and maintained to augment interpretation of vernacular cultural traditions at Edisen Fishery. The *Tern* would not be relocated to the water or operated.

Additional research and documentation related to vernacular boats may be possible under the research-focused alternative C. For examples, the rarity, condition, and number of vernacular boats identified in the 1991 Vernacular Boat Study Archive could be assessed to determine the number of boats beyond stabilization, preservation, or restoration, the number removed from the island, and the number privately owned.

LIGHTHOUSES AND NAVIGATIONAL AIDS

The Rock of Ages Lighthouse and associated features would undergo exterior stabilization and be maintained while the National Park Service identifies preservation partners. Potential environmental hazards associated with lighthouse properties would be mitigated to an appropriate level to ensure the health and safety of employees, potential partners, and park visitors. No visitor access would be provided to the interior of the lighthouse.

Transfer of the Passage Island Lighthouse from the US Coast Guard to the National Park Service would be completed. The lighthouse and fog signal building would undergo exterior stabilization and be maintained while the National Park Service identifies preservation partners. Both docks would be retained, and the rest of the landscape would be preserved as is. The tramway would not be reconstructed.

CIVILIAN CONSERVATION CORPS, MISSION 66, AND OTHER NPS INFRASTRUCTURE

No additional actions related to Civilian Conservation Corps, Mission 66, or other NPS infrastructure would be taken under alternative C.

ETHNOGRAPHIC USE AND RESOURCES

Under alternative C, the park would pursue increased ethnographic research. The park would work with traditionally associated tribes and traditionally associated Scandinavian-American fishers to document ethnographic resources and landscapes and incorporate traditional ethnographic knowledge, practices, and demonstrations into interpretation. Tribal ethnographies would be the first focus of this effort.

MUSEUM OBJECTS

Although many historic vessels were not designed specifically for Isle Royale use, they are still significant to the history of the island and should be included in the museum collection. These boats would receive preservation treatment as museum objects if their condition is not beyond repair.

Mitigations

Regardless of the alternative selected, to ensure that implementation of the CRMP/EA protects natural and cultural resources unimpaired for future generations and provides for a high-quality visitor experience, NPS management policy and best practices for the treatments of historic properties (see appendix A) would be followed. In addition, a consistent set of mitigation measures would be applied to all management actions. The following mitigation measures would be required as part of the proposed action:

- All new construction, landscape development efforts, and historic property treatments would follow the guidance established in Cultural Landscape Reports, Historic Structure Reports, and other documentation when it exists and is applicable.
- All historic property treatments would meet the Secretary of the Interior's standards for historic preservation.
- All historic property documentations and evaluations would be carried out by trained professionals meeting the Secretary of the Interior's qualifications standards.
- The National Park Service would implement compliance monitoring to ensure that the project remains within the parameters of NEPA and NHPA compliance documents.
- The National Park Service would apply for and comply with all federal and state permits required for construction-related activities.
- Projects would be sustainable whenever practicable by recycling and reusing materials, minimizing materials, minimizing energy consumption during the project, and minimizing energy consumption throughout the life span of the project. Adaptive reuse of some historic structures, as identified in the range of alternatives, would further contribute to sustainability.

Chapter 3

AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES





CHAPTER 3: AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

The wide scope and variety of cultural resources on Isle Royale necessitates a comprehensive planning effort to determine how to best manage these resources. Cultural resources documented to date at Isle Royale National Park include more than 250 confirmed archeological sites; 9 identified cultural landscapes representing historic fisheries, recreational properties, and maritime themes; ethnographic resources; museum objects; and historic structures. To date, there are more than 130 buildings and structures listed or eligible for inclusion in the National Register of Historic Places (NRHP), many of which are within identified cultural landscapes. Of these, more than 100 are maintained under volunteer agreements. Another 42 structures are treated as historic but require evaluation for eligibility for the national register. A handful of structures are more than 50 years of age but determined to be ineligible for the National Register of Historic Places. Additionally, a large part of Isle Royale National Park is water and includes many submerged cultural resources from shipwrecks to artifacts from previous inhabitants.

As identified in chapter 1, archeological resources, historic structures and their associated cultural landscapes, ethnographic resources, and visitor use and experience are the impact topics being analyzed in the CRMP/EA. This chapter describes the existing environmental conditions in and around the park for these impact topics and how the existing condition would be impacted because of implementing each alternative. Cumulative impacts resulting from the incremental impacts of the alternatives when added to other past, present, and reasonably foreseeable future actions are also considered.

Affected Environment

ARCHEOLOGICAL RESOURCES

Among the park's more than 250 designated archeological sites are those represented by precontact and historic copper mining pits, Native/European contact and trade sites, historic mining camps, precontact fishery and habitation sites, historic fisheries, shipwrecks, cemeteries, and lighthouse sites. The earliest Native American occupants mined for copper and carried out other subsistence activities on the island. At least 30 of these sites are associated with Archaic period cultures (approximately 2500 to 1000 BC). Initial (1000 BC to 700 AD) and Terminal (600 – 1650 AD) Woodland cultures are associated with many more sites, the comparative number of sites being more reflective of archeological survey priorities than an increase in island use over time. Approximately half of the archeological sites have been deemed eligible for inclusion on the National Register of Historic Places.

Fur trade and Native/European contact goods have been found in various island locales. Many historic activities such as commercial fishing, fur trading, and copper mining occurred on or near precontact sites. The continuum of human use is sometimes thematic, i.e., historic/precontact copper mining or fishing, but it can also relate to environmental site selection such as a prominent point or sheltered beach.



Many known archeological sites have been identified as a result of NPS trail and campsite construction. Modern campground locations—primarily along the modern coast of Lake Superior and the inland lakes—are frequently situated in areas that were previously used by historic and precontact activities. As a result, there have been a few recorded impacts to these archeological resources such as increased site visitation, illegal campfires, and increased social trails. Conversely, much of the island's interior, including its relic shorelines, has not been surveyed and thus there exists a strong potential for further archeological discovery. The findings of recent archeological surveys along these relic shorelines suggest that a great deal of early island prehistory remains undefined. Impacts on

archeological resources at interior locations are minor and usually the result of natural processes and/or decay. Climate change has not had an effect on the island's archeological resources; however, should Lake Superior increasingly become ice-free, there is real concern about winter storms and resulting in larger waves eroding shore-based archeological settings. Rising lake levels will also have impact on coastal sites where natural barriers are at a minimum.

Precontact and Historic Mining. Of more than 250 archeological sites on Isle Royale, approximately 40 are related to the island's copper mining history. Thirteen of these locations show evidence of precontact copper mining activities, three of which later became historic mines. The Minong Mine Historic District is presently listed on the National Register of Historic Places and is known for its extensive inventory of precontact and historic mining features. At present, the park is evaluating the site for National Historic Landmark status. In all, more than 1,000 mining pits scattered throughout the park are attributed to both Archaic and Woodland Native cultures, from the earliest visitation to that of more recent visits.



Archeological sites sometimes contain historic remnants along with precontact evidence. Mining pits and settlements and lighthouse-associated sites have all been identified from the historic period. The four walls of the historic Senter Point Powder House still stand on the feature's namesake. Numerous mining-era wagon roads are still visible today, particularly those associated with the Island and Minong Mines and also the Wendigo Copper Company. Significant stretches of these same roads have been repurposed for modern use as hiking trails. The wagon road from

Siskiwit Bay up to Island Mine is notable in that it traced an even older pathway associated with an Anishinaabeg sugar camp.

The Siskowit and Pittsburg & Isle Royale Mines in Rock Harbor are notable examples of mid-19th-century copper mining landscapes. The Siskowit Mine location features a network of trenches and shafts associated with exploration and production activities. An old stamp mill foundation remains intact with processing areas still visible throughout. Separate foundation works and root cellars tell of domestic purposes. Similar features are found at the Pittsburg & Isle Royale Mine although much of the location's residential features have been eclipsed by Daisy Farm Campground installations and related use. Despite this more recent intrusion, the ruins of the old Ransom Smelter are still intact.

The Smithwick Mine was located on the site of today's Rock Harbor Resort. Although all of the company's mine buildings and residences have been lost, some of the historic mine shafts remain visible on the landscape and have been integrated into the park's interpretive programming. Many separate mine locations are dotted throughout the island wilderness. Most represent short-lived operational histories, and infrastructure footprints are often minimal. Still, exploration trenches, pits and residential root cellars are sometimes easy to discern within the forested environment.

Shipwrecks. The island's archeological shipwrecks are comprised of a variety of designs including large steam ships such as ore boats or passenger-freighters but also smaller vessels including tugs, barges, and fishing skiffs. Ten of the larger wrecks have been formally documented and listed on the national register. The smaller vessels have received less documentation and have not been thoroughly inventoried.



Lake Superior's frigid waters have preserved these vessels as well as their contents; in many cases they appear much as they did following respective wreck events. However, certain vessels have suffered from periods of looting by relic-hunting scuba divers. The park believes that such activities have largely waned, and, in some cases, former island divers have returned artifacts they had collected in years past. However, it is likely that some looting still occurs.

Zebra and quagga mussels have devastated ecosystems in the lower Great Lakes. Shipwrecks in these locations are often covered with invasive mussels and removal is virtually impossible. Should these mussels take root in Lake Superior, it will only be a matter of time before the island's shipwrecks are impacted.

Cemeteries and Burial Sites. The historic themes mentioned above had their own share of tragedies, which is best expressed by the presence of the island's multiple cemeteries. Although numerous cemeteries and/or interments are mentioned in the historic record, only three have been formally identified on Isle Royale. The most notable is that found on Cemetery Island, which features at least nine interments related to mining activities in Rock Harbor. A single interment is located in the vicinity of the Bangsund Fishery and is reported to be associated with a nearby mining endeavor. Two interments are found along the Island Mine trail between Siskiwit Bay and the main mine workings below the Greenstone ridgeline. The single headboard between the Edisen Fishery and Rock Harbor Lighthouse is considered a "tribute" monument for an unknown grave closer to the Saginaw Mine location. Historic documents note that additional interments are located near Todd Harbor, McCargoe Cove, and the Saginaw Mine; however, their physical locations have not been identified.

For cemeteries that have been located, fenced enclosures are found at many of the interments. Although none of the fencing is original, the replicas were derived from measurements and photos taken of them prior to replacement. Cemetery Island and the single interment at Bangsund are fairly popular with island visitors. The Island Mine cemetery is less known and visited rarely. Visitor impacts are minimal at present; however, a Cemetery Island interment was disturbed by an unknown relic hunter in the 1990s. No disturbances have been recorded since then. The park performs light vegetation clearing within the fence enclosures at Cemetery Island.

HISTORIC STRUCTURES AND ASSOCIATED HISTORIC DISTRICTS AND CULTURAL LANDSCAPES

The park contains more than 190 structures that are more than 50 years old, approximately half of which are within the park's wilderness and backcountry. A few of these structures have been determined ineligible for inclusion on the National Register of Historic Places, but most are either listed or have been determined eligible. These structures are from the various historic eras of island use and development. Some, such as lighthouses and fishery sites, are representative of the island's maritime heritage. A single historic structure associated with the mining era, the Senter Point powder house, still stands at the western end of Siskiwit Bay, in wilderness. Many cabins, hotels and associated buildings are from the resort era and the early development of the park idea at Isle Royale.

Twenty-five structures are listed in the national register and include the buildings at all four lighthouses, the Edisen Fishery, and Johns Hotel. Although these are the only structures currently listed in the national register, the Michigan State Historic Preservation Office concurs with the park that most others are eligible for listing. Until formal evaluations are possible, most structures older than 50 years of age are considered historic and are managed as such.



Recreational Resorts and Cottages.

Although the island's recreation history begins in the late-19th century, formalized resort complexes were not established until around the turn of the 20th century. The Johns Hotel had opened by 1898 and offered modest amenities to island tourists who were frequenting the island in ever increasing numbers. Other resorts soon popped up elsewhere and included the Belle Isle, Park Place, Tobin Harbor, Tourist Home, and Island House resorts. During Isle Royale's golden era of tourism and recreational development, the island witnessed the rise of modest, rustic resorts

operated by commercial fishermen; full service resorts built by steamship owners and other developers; a private sporting club developed by a group of wealthy Duluth businessmen; and a number of private cabins and houses, many clustered around the island's harbors creating summer cottage communities. Most of the resort and recreation accommodations in Isle Royale's history were of modest proportion when compared to the grand resorts on the mainland.

The resorts experienced a few decades of growth and prosperity, but, with the increasing popularity of automobile-based vacations and impacts of the Great Depression, island resorts saw clientele wane in the late 1920s and early 1930s. Following park establishment, many resorts were shuttered and eventually demolished to allow for an island experience with few visible signs of human occupation. Because it was well positioned at the location of the new park's main receiving area for visitors, historic structures in Rock Harbor were retained. Among the island's many standing historic structures, nine structures relate to the resort era. One of these, the Johns Hotel, is listed in the national register.

Many resort patrons were enamored with Isle Royale, and some pursued private ownership as a result of their stays. By the 1920s, numerous private enclaves had been established around Isle Royale's periphery, many on small islands and in protected harbors. Of the nearly 180 historic structures on Isle Royale today, more than 75 are associated with summer cottage history. Prior to 1940, there were no less than 225 such structures. None of the summer cottages were considered historic at the time of park establishment and the majority of camps and related buildings were razed shortly after purchase, as was common practice in national park units. Approximately one-third of the summer camps and related cabins and cottages built during the resort era are intact. Some of them are still occupied by descendants of the original occupants who had retained life leases as part of the original purchase agreements and were subsequently granted special use permits to maintain their family dwellings. Although the camps are island-wide, two clusters are most prominent, Tobin Harbor (in wilderness) and Barnum Island. On the north side of the island, 34 summer cottage buildings were once spread amongst four locations including Crystal Cove, Captain Kidd Island (both in wilderness), and Clay and Fisher Islands. Today, 15 of these buildings are considered historic and are associated with the Crystal Cove and Capt. Kidd locations.

Nine special use permits issued to the children of lessees in 1977 remain valid. The permits are part of a resolution regarding a discrepancy in the original life leases, primarily those in the Tobin Harbor vicinity. In every case, all buildings and associated structures are public property, including those with 1977 special use permits; all purchases were concluded prior to park establishment in 1940. A few historic buildings, including former lessee cabins and Civilian Conservation Corps facilities, have been converted for park use. Where life leases and special use permits have expired, maintenance has often waned and the structures are beginning to show wear and tear from the island's harsh environment. VIP agreements help the park manage the difficult task of maintaining this array of historic structures.

Barnum Island contains historic structures and landscapes associated with resorts and recreational cottages. The Johns Hotel, listed in the National Register of Historic Places, is being restored by Johns Family descendants with some assistance from the National Park Service. Four structures are associated with this side of the Johns' history on Barnum Island, which was then known as Johns Island. Three of these structures are composed of log. Many of the hotel's logs were replaced, and similar work is needed on remaining log structures.

Barnum Island once featured 18 recreational cottage structures, 13 of which remain standing and are considered historic. Park volunteers, including descendants and family friends of original life lessees, maintain many of these structures.

On Washington Island, many of the nine standing historic resort structures are associated with the historic Island House (Singer) Resort. Following closure of the lodge, the National Park Service permitted fishermen to occupy some of the structures, many of which were demolished in the 1950s and 1960s following abandonment. The remaining cabins are in fairly good shape, and their upkeep is supported by the fishermen and their descendants.

At Rock Harbor, lodge buildings include those constructed by Kneut Kneutson and his daughter, Bertha Farmer, in the early 20th century and by the National Park Service during the Mission 66 era. As part of the Mission 66 initiative, most of the earlier rustic cottages and outbuildings associated with the Farmer era resort (known as Park Place) were phased out for more modern accommodations. Only two buildings from this era remain and are considered historic, the Guest House and the Spruces Cabin. Both structures have been repurposed for modern use and are in good condition.

In addition to the lodge structures, 45 recreational cottage structures dotted the Rock Harbor area during the heyday of the recreational era, including at Snug Harbor and on Davidson and Tooker Islands and at the Manthey location across from West Caribou Island. Most of these structures were removed in the 1950s. Two buildings associated with the Farmer location are considered historic; both are in nonwilderness and are in good condition.

Folk and Commercial Fisheries. Approximately 40 of the nearly 180 historic structures on Isle Royale are associated with the island's commercial fishing history. For a century, from the 1830s until the establishment of Isle Royale National Park, Isle Royale was a base for numerous commercial fishing interests. The largest operation was undertaken in the 1830s by the American Fur Company, which had fishing posts at Checker Point, Card Point, Belle Isle, and Rock Harbor. The American Fur Company left the island within a decade, and no standing structures remain. In the years that followed, however, many smaller outfits took root in the sheltered bays and harbors scattered island-wide. These sites include Wright Island, Johnson Island, Fisherman's Home, Washington Island, and the Mattson Fishery in Tobin Harbor. Many feature intact buildings (fish houses, net houses, and cabins), docks, and boats.

The restored Edisen Fishery in nonwilderness and its eight historic structures are listed in the National Register of Historic Places. Buildings associated with the Edisen Fishery and on Washington Island are some of the best preserved of the surviving fishery buildings and structures at Isle Royale.

At one time, at least 15 fishery-specific structures were located on Washington Island. Most were associated with two separate fisheries, one run by Stanley Sivertson, the other by his brother Art. Only buildings associated with Stanley Sivertson's fishery remain. Art Sivertson's fishery was removed in the 1950s following a hiatus in his fishing activities. A single net house structure is standing close to the old resort buildings associated with the Singer Lodge complex. The net house was used as part of the Eckel Fishery, which mostly used former resort structures. The net house is standing but is in poor condition. It is worth noting that additional Washington Island structures originally constructed in association with the Island House (Singer) Resort were used by Isle Royale fishermen for fishing purposes. With Walter Singer's permission, fishermen repurposed some of the buildings for their own use after resort operations had ceased in the late 1920s and early 1930s. Some of these structures remain, but their significance lies within context of resort history.

Originally developed in the 1890s by Louis Mattson and John Anderson, the Edisen Fishery (a fishery in the Rock Harbor channel) was later used by Mike and Sam Johnson and then by Pete Edisen who married into the Johnson family. The collection of buildings at the fishery reflects years of use and related development by multiple parties. The existing complex comprises eight historic structures including a fish house, net house, main residence, and separate outbuildings used to house fishermen and visitors. The complex was fully restored in the mid-1990s, and all buildings are in good condition.

Vernacular Boats. Vernacular boats are synonymous with commercial fishing as well as other island histories. These historic, handmade, wooden boats are largely abandoned watercraft found along shorelines island-wide. Many are found in close proximity to commercial fisheries although some are found near recreational resorts and cottages. Although preserved island boats do exist, most of those found at fishery sites are in various stages of decay and are for the most part considered ruinous, i.e., archeological. Boats of note include the *Tern*, *Belle*, *Moonbeam*, *Skipper Sam*, and *Minerva*.

Lighthouses and Navigational Aids. Isle Royale features four lighthouses dotted the island periphery. The first, Rock Harbor Light, was constructed in 1855 to guide ships into Rock Harbor channel. The other three, Isle Royale Light, Passage Island Light, and Rock of Ages, were built at strategic locations to warn ships away from the rocky archipelago. All four lighthouses are listed on the National Register of Historic Places. Additionally, the US Coast Guard maintains Blake Point Light on the northeastern tip of the main island. This location needs to be evaluated for historic significance.

The 1855 Rock Harbor Light was built following the island's first mining boom and is the oldest standing structure in the park. Unlike subsequent lights built on Isle Royale, the Rock Harbor Light was deemed necessary to guide ships into the Rock Harbor channel where numerous mining endeavors had based their operations. By the time the lighthouse complex was completed, virtually all mining in Rock Harbor had ceased. After brief operations in the 1870s, which complimented the island's second mining boom, the light was decommissioned in 1879. During its active years, the Rock Harbor Light complex featured the lighthouse, a barn and dock near the lighthouse proper, and a boathouse at the site of the Edisen Fishery. Much of this infrastructure had disappeared by 1931; today, only the lighthouse remains. This structure was fully restored between the 1960s and 1990s and now serves as the island's maritime history museum.

The Isle Royale Light was constructed on Menagerie Island in 1875 and marks the entrance to Siskiwit Bay but also to a treacherous chain of islands extending northeast from Houghton Point. The light remains an active aid to navigation and is owned and minimally maintained by the US Coast Guard. The Isle Royale Light complex is composed of six historic structures, all of which are listed in the national register. Five structures are standing, including the lighthouse, privy, outbuilding, oil building and an acetylene vault, and all are in good condition although building interiors feature varied stages of deterioration. The sixth feature is a foundation ruin related to an old boathouse.

The Passage Island Lighthouse was constructed at the far southwestern tip of Passage Island in 1882. The light serves as a navigational aid for ships traveling through the gap between Passage Island and the northeastern tip of Isle Royale. The light remains an active aid to navigation and is owned and minimally maintained by the US Coast Guard. The Passage Island complex is composed of several historic structures and features including the lighthouse, foghorn house, hoist house, oil house, pump house, privy, dock, boathouse, tramway, antenna tower, tower foundation, and a concrete pier. Excluding the boathouse, all of the structures are in nonwilderness settings. All of the structures are in good condition.



The Rock of Ages Light is a solitary structure constructed in 1908. There are no associated outbuildings. The lighthouse exterior shows years of disuse and neglect but remains in fair condition. The lighthouse interior is in poor condition. However, restoration efforts are underway in cooperation with a new preservation partnership. The light recently transferred from the US Coast Guard to Isle Royale National Park.

Civilian Conservation Corps, Mission 66, and Other NPS Infrastructure. In the mid-1930s, after most of the island interior had been purchased by the US government, the Civilian Conservation Corps was tasked with installing initial park infrastructure including trails, buildings, and fire towers. Aside from the park's trail system, much of the CCC structural footprint has disappeared from the island landscape. Many of the old bunkhouses were removed to make way for more comfortable accommodations. As part of the Mission 66 initiative, the old wooden CCC-built fire towers were toppled and replaced by modern steel structures. A few structures remain evident, such as the Pumphouse and Quarters 4 on Mott Island, which have been determined eligible for the National Register of Historic Places. Separately, the Malone Bay ranger station was constructed in 1956 of salvaged sections of CCC buildings. Formal consultation has not yet been undertaken with the Michigan State Historic Preservation Officer to determine national register eligibility of this structure; for now, it is considered historic.

As part of the nationwide Mission 66 initiative, a ten-year program (1956–1966) intended to dramatically expand visitor services before the NPS 50th anniversary, extensive construction, and numerous improvements were made at Rock Harbor and Mott Island. At Rock Harbor, the National Park Service phased out many of the older structures associated with the Park Place Resort and replaced them with new lodge buildings at the waterfront, the “housekeeping” cottages on a ridgeline above Tobin Harbor, a new employee dormitory, and a visitor bathroom near the old dining room. There are 16 buildings in total. These buildings, together with remaining Park Place infrastructure, became associated with what is known today as the Rock Harbor Lodge complex. Separately, NPS visitor services were enhanced with the construction of a new visitor center and auxiliary bath and shower building.

On Mott Island, there are 14 Mission 66 structures of varied purpose. The two main dock structures, the administrative building and warehouse, were both improved in accordance with the Mission 66 theme. A new boathouse and an employee dormitory were constructed. Separate residences were constructed near the southwest side of the Mott Headquarters complex. Although a formal evaluation is still pending for the Rock Harbor and Mott Island structures, all are more than 50 years old and would be considered historic until the evaluation is completed.

The Siskiwit River Bridge, in wilderness, is also an artifact of the Mission 66 era and spans a narrow stretch of its namesake river a few hundred meters inland from where it empties into Siskiwit Bay. The bridge is a modest construction, composed of cylindrical steel pilings and an upper structure of wood and steel tubing. It is nearing the end of its useful life. The bridge is still in need of a formal evaluation of its eligibility for the National Register of Historic Places. Until this is completed, the bridge is considered historic.

Four separate moose exclosures in the vicinity of campgrounds at Siskiwit Bay, Daisy Farm, and Windigo were installed in the 1950s and are used intermittently for research. Each comprises a 50-foot by 50-foot fenced exclosure that prevents browsing of enclosed vegetation. Two exclosures are located in wilderness. The exclosures are maintained by park natural resource staff; maintenance consists of occasional post replacement and fencing repair. Like the Siskiwit Bridge, the moose exclosures are considered historic until a formal evaluation is possible.

ETHNOGRAPHIC RESOURCES

Ethnographic resources have significance to native peoples or historic island communities and include precontact and historic sites, structures, landscapes, fauna, and objects and natural resources such as rivers, watersheds and plant and animal species.

With regard to American Indian use, the National Park Service has documented hundreds of plant species used historically or currently by Ojibwe peoples, although the occurrence and distribution of these plants at Isle Royale is mostly undocumented. Known examples of ethnobotanic species significant to native peoples and found at Isle Royale are sugar maple, used for sugar production, and devil’s club, used for its medicinal properties. The Ojibwe people of the north shore of Lake Superior may still use island resources; however, the park staff has limited knowledge of such use. A traditional cultural property evaluation related to use of the island by the Grand Portage Ojibwe has been completed. Additional ethnographic resources may be present in the park. The only detailed ethnographic study completed thus far is that of the Scandinavian commercial fishing culture that was prevalent in the first half of the 20th century.

Scandinavian folk and commercial fishermen actively engaged in fishing, and children of these fishermen who grew up at these active fisheries were determined to be a traditionally associated people in 2012. In this context, “traditionally associated people” is defined as “commercial fishermen actively engaged in fishing when the park was established and the children of these commercial fishermen who held commercial fishing licenses and permits and who were raised and participated in this lifestyle and livelihood.” A separate study of the vernacular boat-building traditions of Isle Royale fisherman documents related cultural traditions and their use of island resources.

Fishing as a profitable and permitted occupation was affected by creation of the national park, the lamprey invasion, the opening of greater economic opportunity on the north shore of Lake Superior, and the post-lamprey initiation of limited “assessment fishing.” Even after the lamprey invasion and at times when fishing was even less profitable, Isle Royale family histories have remained wedded to the story of fishing at Isle Royale and living on the island, and the island remains a fundamental place for their sense of community. Today, this is a fragile but viable community; only about 20 Isle Royale folk fishers remain who grew up in an island-anchored folk culture prior to the fishing closures brought about by the sea lamprey in Lake Superior. Although assessment fishing—that is, limited catch for research purposes—is possible within Isle Royale waters, there have been no active permits since 2005.

VISITOR USE AND EXPERIENCE

Enjoying the park and its cultural resources at a slow pace with mostly unfettered access to those resources is a fundamental part of the visitor experience at Isle Royale. This experience is heightened when it progresses from simple enjoyment to an understanding of the reasons for the park’s existence and the significance of its resources. Participating in personal interpretive services (staffed visitor centers, ranger- or volunteer-led activities) and making use of nonpersonal interpretive services (wayside exhibits, visitor center exhibits, publications, and computer technologies) helps visitors form their own intellectual and emotional connections with the meanings and significance of the park’s resources. Additionally, having access to and activities associated with cultural resources further heightens the visitor experience.

Many visitors express an interest in the preservation of a wide range of cultural resources at Isle Royale. Visitors also have expressed interest in continued or increased educational or interpretive opportunities focused on themes of cultural resources or the interplay between people and nature on Isle Royale. Visitors are particularly interested in increased on-site and off-site interpretation, including the development of smartphone apps and other technology for self-directed learning opportunities, as well as on-site “field schools” and “ranger walks/talks” of various types. Other visitors value more self-directed experiences and enjoy Isle Royale as a place for reflection, solitude, and low-key experiences. These visitors often express support for passive interpretation that allows self-discovery with limited support (such as a photo directory of cultural sites).

Isle Royale is officially open to visitors from April 16 through October 31 each year. The short visitor season and challenging travel logistics make it one of the least visited national parks in the lower 48 states. Visitation at Isle Royale averaged 17,600 between 2004 and 2017, and the majority of visitors made their trips in July and August. Visitors who make the journey to Isle Royale tend to stay longer, however, than at many other parks. These lengthier stays provide an opportunity for extended experiences in the park. The average stay is 4.5 nights, primarily because of the travel logistics to the island (i.e., several ferries only make return trips to Michigan or Minnesota on certain days of the week). The majority (about 80%) of Isle Royale’s visitors travel to the park from Michigan, Minnesota, Wisconsin, and Illinois. The park receives few international visitors, estimated to be less than 1% of the park’s visitation. Most international visitors are from Canada.

With no roads on Isle Royale, visitors travel through the park by boat or on foot. Visitors come to the park for a variety of reasons and to participate in many different activities, including backpacking, motor boating on Lake Superior, canoeing, kayaking, sailing, observing wildlife and birds, fishing, and photography. Some visitors come to learn about and explore the park’s natural, cultural, and wilderness resources. Others seek restorative experiences such as relaxation, observing the scenic beauty, and spending time in a natural setting away from the distractions of modern civilization.

Visitor Locations and Associated Activities, Interpretation, and Education Related to Cultural Resources

Developed Visitor Areas—Three main developed visitor areas are associated with Isle Royale National Park; one is on the mainland of Michigan (in the city of Houghton) and two are on Isle Royale (Rock Harbor and Windigo). These areas serve as the main visitor service areas related to obtaining information, interacting with park staff, buying food and supplies, or for lodging. In addition to these areas, visitors also occasionally visit the developed Mott Island, though it is mostly administrative and has few visitor services.

Isle Royale’s year-round administrative headquarters is in Houghton, Michigan. The Houghton headquarters has a small visitor center and sales area, administrative office buildings, museum storage facility, warehouse, and maintenance shop. It is the departure point for the NPS ship, Ranger III, which carries visitors, staff and freight across Lake Superior to Isle Royale.

A wayside exhibit at the visitor center and several on the Ranger III interpret local history, and island cultural and natural history. Educational videos are shown on a variety of natural and cultural history topics. The visitor center includes a few examples of artwork by a number of artists-in-residence.

The park’s summer island headquarters are on Mott Island. Facilities include office buildings, warehouse and maintenance shops, a boat repair/carpenter shop, and employee housing. Mott Island is often the first stop for the 20% of park visitors arriving from Houghton on the Ranger III. Currently, there are no visitor-related facilities at Mott Island, interpretive waysides, or exhibits. The Ranger III typically stops at Mott Island for 30-45 minutes to offload park staff and supplies, and passengers can disembark and stretch their legs on a short hike. The lack of visitor-related facilities and interpretive waysides at Mott Island does not appear to be an issue for park visitors, mostly because of their generally short length of stay. Most park operations are conducted or supported by employees living and working at Mott.



Rock Harbor, at the northeast end of Isle Royale, is an important visitor destination and plays a key role in visitors’ experience of the island because it is the main visitor entry point, and many visitors may not explore much more of the island than those attractions within a day hike or short boat ride from Rock Harbor. Rock Harbor has a number of visitor facilities, including a visitor center, auditorium, campground, nature trail, and the Forever Resorts concession operated Rock Harbor Lodge with overnight lodging facilities, restaurant, snack bar, gift shops, and marina with fuel sales and canoe, kayak, and powerboat rentals. Full-service lodge

operations are from early June to early September. The Rock Harbor Lodge also runs a water taxi that provides service around the northeast part of the island and fishing charters. An excursion boat, *The Sandy*, provides sightseeing trips to points of interest such as the Passage Island Lighthouse, Edisen Fishery, Rock Harbor Lighthouse, Hidden Lake, Lookout Louise, and Raspberry Island. Some of these trips offer a guided interpretive tour with an NPS ranger.

The Rock Harbor visitor center is open daily during the visitor season. Visitors can obtain park information, pay user fees and purchase season passes, obtain permits, register boats, purchase educational materials, and enjoy small natural and cultural history exhibits.

A variety of interpretive and educational opportunities are available for visitors in Rock Harbor. Evening programs offered regularly during the open season at the nearby Rock Harbor auditorium include a variety of natural and cultural history topics. Guided walks are offered several times each week, and other guided walks and interpretive talks are offered when personnel are available. Upon arrival of passenger ferries, area orientations are presented, and backcountry orientations are provided for backpackers before permits are issued.

Various wayside exhibits present aspects of the cultural and natural history of the area. These are on the Stoll Trail loop up to the wilderness boundary, the trail to the America dock, and along Snug Harbor. Limited exhibits in the Rock Harbor visitor center explore geology, animal life, and cultural history.

The *Ranger III*, concession ferries *Isle Royale Queen IV* and *Voyageur II*, and the concession-operated Isle Royale seaplane drop off and pick up passengers at Rock Harbor on a regular basis, all of which help to make it the main visitor entry point in the park. Tobin Harbor, which is adjacent to Rock Harbor, has a seaplane landing area/dock and boat docks. Visitors can access the park trail system from Rock Harbor via the Tobin Harbor Trail and Rock Harbor Trail.



Windigo is the closest entry point on the island to the Minnesota side of Lake Superior, and two concession ferries, *Voyageur II* and *Sea Hunter III*, provide service from Grand Portage, Minnesota, to Windigo. Seaplane service also exists to Windigo, from Michigan and Minnesota. The Windigo developed area is near the southwestern end of Isle Royale. Its facilities include a visitor center/ranger station, docks, campground, nature trail, and restrooms. The Forever Resorts concession at Windigo

operates a small camp store, showers, canoe, kayak and motorboat rentals, and two rustic cabins. The Wendigo Mining Company operated from their headquarters, located just behind the Windigo Visitor Center from 1890 to 1892, and visitors at Windigo can visit the nearby mine site.

Visitors can access two main hiking trails, the Greenstone Ridge Trail and Minong Ridge Trail, from Windigo as well as the Feldtmann Loop Trail. Many of these trails were once part of the network of old mining roadways stretching between Huginnin Cove and Lake Desor.

The Windigo ranger station and visitor center is built around the Rock of Ages Second Order Fresnel lens and pedestal and features interpretive exhibits and displays and sales of educational materials. Evening programs on a variety of natural and cultural history topics are offered regularly during the open season. Nature walks and dockside talks are conducted. Upon arrival of passenger ferries, a general orientation is provided before permits are issued.

A self-guided nature trail describes aspects of natural and cultural history. A nature trail guide is available at the visitor center, and numbered posts along the trail correspond to the guide.

Visitor Recreation Facilities and Association to Cultural Resources

Evidence of Isle Royale's cultural history is scattered across the island. Many precontact and historic resources are in the same places as visitor facilities. Suitable sites for camping and development are limited because of the rocky and rugged terrain, and premium locations have been used repeatedly throughout history by the island's residents and visitors.



Hiking Trails— The Isle Royale hiking trail network is approximately 165 miles in total length and enables visitors to the park to hike to a number of cultural resource destinations. Many of the trails pass by historic mining remains, such as the Island Mine trail and the Rock Harbor trail, and historic fisheries, lighthouses, and recreational cabins are visible from locations along the hiking trails.

Campgrounds— More than half of the 36 campgrounds across the island are along the Lake Superior shoreline. All campgrounds have tent sites and

outhouses. Most of the campgrounds on Lake Superior have three-sided screened shelters as well as tent sites, and many also have boat docks for visitor overnight and day use.

Many campgrounds are located near cultural resources on the island, in part because these are areas of safe harbor or suitable topography for camping that people have used throughout the island's history. For this reason, many of the campgrounds provide easy access to some of the island's cultural resources.

For example, Daisy Farm is a large boater/hiker campground in the Rock Harbor channel across from the Edisen Fishery and Rock Harbor Lighthouse complex. Evening programs are presented once or twice a week during the summer, as well as occasional guided interpretive walks. Interpretive programs at Daisy Farm typically reach a total summer attendance of around 550 visitors. Program attendance is dependent on how many people are in the campground when the programs are offered. Campground bulletin boards updated with program announcements and regulatory/safety information describe interpretive programs and provide some interpretation. The campground is staffed with a ranger or volunteer. Nearby cultural resources include the Ransom Smelter Site and historic mining location.

Other examples of cultural resources in proximity to campgrounds include:

- **McCargoe Cove campground**—Precontact Minong Mine resources are evident.
- **Todd Harbor campground**—Historic mining resources are evident.
- **Island Mine campground**—Historic mining resources from the Island Mine are nearby.
- **Chippewa Harbor**—The Johnson commercial fishing camp and resort resources are nearby.
- **Siskiwit Bay campground**—Logging resources from the 1930s and CCC camp resources are nearby. The Senter Point powder house from the Island Mine operation is a short walk.
- **Malone Bay campground**—A capped archeological site (capped in the early 1990s) is nearby; it is the closest campground to the Menagerie Island lighthouse and fishing camp resources on Wright Island.
- **Belle Isle campground**—A historic structure and the shuffleboard court remain from the Belle Isle Resort.

Primary Cultural Resource Visitor Destinations— Visitors currently can view and visit various cultural resources sites in the park, including commercial fisheries, summer resorts and cabins, lighthouses, and copper mines. At a few locations, park rangers and volunteers provide guided tours, but most sites are self-discovery locations.

Edisen Fishery— The Edisen Fishery tells the story of the island’s once thriving commercial fishing industry. It has been restored to the 1930s–1950s time period and is typical of a small family fishing operation. Visitors can take a short boat ride from Rock Harbor or Daisy Farm to reach the fishery. Park volunteers live on-site and provide tours for visitors. An interpretive wayside about the Edisen Fishery is at the head of the dock. Many visitors value the experience to learn about the lifeways of previous fisher families of Isle Royale through the historic fisheries, particularly through the interpretive opportunities at Edisen.

Bangsund Fishery— Visitors can take a short hike or boat ride from the Edisen Fishery and the Rock Harbor Lighthouse to the Bangsund Fishery, which now is the island base for a long-running cooperative wolf-moose predator-prey study with the Michigan Technological University. From the early 1900s to the 1950s, Bangsund was the site of a small-scale family commercial fishing operation, and evidence of this operation remains. During the summer, the researchers display moose skulls and wolf bones and share their experiences with visitors.



Other Fisheries— Other fisheries, such as Wright Island, Fisherman’s Home, Hay Bay, Washington Island, and Long Point, serve as discovery sites and are not currently interpreted through signs or interpretive materials on-site. Visitors can access these other fisheries by foot or watercraft. No access is allowed to the interiors of buildings at these sites, but visitors can walk around the sites and view the exteriors of the buildings. Information about the sites is available in various books that are sold at the park visitor centers.

Recreational Resorts and Cabins— Visitors can enjoy a representative sample of recreational cottages on Isle Royale and the rich history of these cottages as it relates to vacationing families at Isle Royale. Visitors can access recreational resorts and cabins by foot or watercraft. No access is allowed to the interiors of these buildings, except for those at the Rock Harbor Lodge, but visitors can walk around the sites and view the exteriors of the buildings. Ranger-led interpretive programs are occasionally presented, but no pamphlets or brochures interpreting the cabins are available.

Lighthouses— Many visitors seek out the lighthouses of Isle Royale and enjoy learning about the park's maritime heritage. Visitor access is permitted to the exteriors of all four lighthouses (Rock of Ages, Isle Royale, Rock Harbor, and Passage Island). Interior access is permitted to only the 1855 Rock Harbor Lighthouse, located a quarter-mile from the Edisen Fishery, which houses a self-guided maritime history exhibit. No overnight visitor use is allowed at any of the lighthouses. A guided interpretive hike via the Sandy excursion boat includes the exterior of the Passage Island Lighthouse. A lighthouse brochure, featuring all four lighthouses, is available at the visitor centers.

Shipwrecks— The cold waters of Lake Superior preserve a variety of shipwrecks in outstanding condition for exploration and photography. Many visitors express interest in continued preservation of shipwrecks and enjoy opportunities to explore these shipwrecks through various means, including dive opportunities. Nine shipwreck sites are buoyed to provide a safe mooring and protect the wrecks from anchor/tie-off damage and can be accessed by visitors as recreational dive sites. Dive permits are available at the Houghton, Rock Harbor, and Windigo visitor centers. During the past decade, the park has issued about 180 dive permits per year. Several companies are licensed by the National Park Service to guide SCUBA trips at the park. The Rock Harbor Lighthouse includes an exhibit featuring shipwrecks, and the park produces a scuba diving brochure, made available at the visitor centers.



Precontact and Historic Mining Sites—

Many visitors find the indigenous copper mines and their associated influence on regional trade networks a compelling story of national importance. Visitors enjoy these sites when actively interpreted and through self-directed discovery. Visitors can access precontact and historic mining sites by foot or watercraft. These sites include the Island Mine, Wendigo Mine, Siskowit Mine, Smithwick Mine, Minong Mine, mining resources at Todd Harbor, and the Ransom Smelter Site at Daisy Farm. Fencing around mine shafts is retained

for visitor safety. Interpretive waysides at the Smithwick Mine, Minong Mine, and on the Scoville Point trail (interpreting precontact mining) are maintained.

Cemeteries and Burial Sites— Cemeteries and burial sites serve as discovery sites and are not currently interpreted through signs or interpretive materials on-site. Visitors can access cemeteries and burial sites by foot or watercraft.

Environmental Consequences of the Alternatives

EFFECTS ON ARCHEOLOGICAL RESOURCES: NO-ACTION ALTERNATIVE

Precontact and Historic Mining. Under the no-action alternative (and as part of all alternatives), mining sites would continue to be monitored periodically. Monitoring schedules may be modified to address any resource concerns that may arise, such as the potential for visitors to create social trails in the vicinity of mining sites, or additional resource impacts resulting from artifact theft and disturbance. Continued documentation and inventory and evaluation of historic mining resources, including the Minong Mine, would contribute to increased understanding of the resources in order for park staff to provide more informed management of the resources, a beneficial impact to historic mining resources.

The practice of clearing vegetation around mine shafts in high-traffic areas may provide some slight beneficial impacts, as clearing vegetation to provide better views of the mine shafts would likely deter park visitors from clambering on or near historic mines. There is a very slight chance that adverse impacts may occur during clearing activities because of accidental trampling of resources.

Shipwrecks. As part of all alternatives, intermittent monitoring and maintenance of mooring buoys would help protect shipwrecks from anchoring damage. They also assist managers in identifying deteriorating conditions or potential future impacts as a result of visitor use and assess potential management activities proactively.

Additionally, the continued use of the shipwrecks as recreational dive sites may result in additional resource impacts such as artifact theft or disturbance. These impacts would continue to be limited by the permitting and use restrictions placed on recreational divers when visiting these sites (i.e., most visitors are on guided dive tours, thus limiting potential impacts).

Cemeteries and Burial Sites. As part of all alternatives, the park would continue its efforts to identify precise cemetery and burial site locations island-wide in an attempt to limit adverse impacts to these sites from existing campgrounds and park development, and any future development efforts that might impact these sites inadvertently. This, in turn will help to minimize any future adverse impacts to these sites as a result of visitor use or park operations.

Cumulative Impacts. Other past, present, and reasonably foreseeable actions have adversely affected, or have the potential to adversely affect, archeological resources island-wide. NPS activities involving ground disturbance (such as the construction of campsites and trails or fire management activities) may have inadvertently disturbed archeological resources, causing adverse impacts. Additionally, continued visitor use on the island and associated uses, such as illegal campfires and increased social trails, may continue to adversely impact archeological resources.

Under the no-action alternative, beneficial impacts on the park's archeological resources would also result from continued professional NPS archeological management actions to locate and document sites, and then extend to them protection from disturbance. Consequently, the adverse impacts of the other past, present, and reasonably foreseeable actions described above, in combination with the impacts of the no-action alternative, would result in an overall beneficial impact on existing archeological sites (as they are located and protected). However, previous adverse impacts associated with disturbance would not be healed and could continue to occur in unevaluated areas.

Conclusion. Continuation of current management of cultural resources would result primarily in long-term beneficial impacts on archeological resources. Identified sites would be preserved and protected in accordance with NPS policies and guidelines. Adverse impacts could occur from natural erosion, visitor use, ongoing NPS maintenance operations, and other factors. The minimal adverse impacts associated with the no-action alternative would represent a small component of the adverse cumulative impacts, and the beneficial impacts as a result of the no-action alternative would represent a reduction of the cumulative adverse impacts.

EFFECTS ON ARCHEOLOGICAL RESOURCES: ALTERNATIVE B (NPS PREFERRED ALTERNATIVE)

Expanded archeological research to address information data gaps and archeological inventories of previously unsurveyed areas would have long-term beneficial impacts on the park's archeological resources by increasing understanding of the island's former inhabitants and the nature of past activities. Similar beneficial impacts would be expected to arise from increased understanding of prehistoric and historic mining associated with expanded monitoring and research.

Shipwrecks. Under alternative B, there would be an increased emphasis on shipwreck documentation, monitoring, and interpretation that would provide a higher standard of resource understanding and more nuanced protection of sites, a beneficial impact. Increased promotion of guided dive tours and possible use of remotely operated vehicles would be monitored and managed to limit any potential adverse impacts to shipwrecks as a result of heightened use and awareness. Increased tours may result in additional resource impacts such as artifact theft or disturbance, adversely impacting archeological resources; however, with increased access comes increased public stewardship ethic, a potential beneficial impact. The park may consider limiting tours to specific sites that have been "hardened," i.e., sites with few delicate components or portable artifacts, therefore maximizing the potential for beneficial impacts generated by resource awareness and limiting adverse impacts from visitor activities.

New Construction and Cultural Landscape Rehabilitation. Archeological surveys and monitoring (as necessary) would be carried out for all project areas and cultural landscapes entailing ground disturbance to ensure that significant resources that may exist in these areas are avoided or adequately mitigated. Actions potentially requiring archeological assessment include the development of interpretive walking trails, the installation of picnic and pit toilet facilities, possible future infill of new or relocated structures at Rock Harbor or Barnum Island, and the removal of existing docks and construction of new docks on Barnum Island. Archeological assessments would be carried out for light stations identified for cultural landscape rehabilitation and for areas where nonhistoric buildings would be removed should these actions involve ground disturbance. Only minimal adverse impacts on archeological resources are anticipated as a result of efforts to identify and avoid potential sites.

Cemeteries and Burial Sites. Actions and associated impacts to cemeteries and burial sites under the NPS preferred alternative would be the same as those described in the no-action alternative.

Cumulative Impacts. Other past, present, and reasonably foreseeable actions that have adversely affected, or have the potential to adversely affect, archeological resources island-wide would be the same as those described in the no-action alternative.

The impacts associated with implementation of the NPS preferred alternative would have primarily beneficial impacts as a result of continued and increased professional NPS archeological management actions to document and protect resources. Adverse impacts on the park's archeological resources

would also result from the continued and increased visitor use in areas with potentially sensitive archeological resources. Consequently, the adverse impacts of the other past, present, and reasonably foreseeable actions described above, in combination with the impacts of the preferred alternative, would result in an overall beneficial impact on existing archeological sites (as they are located and protected). The minimal adverse impacts associated with the NPS preferred alternative would represent a small component of the adverse cumulative impacts, and the notable beneficial impacts as a result of the NPS preferred alternative would represent a large component of the cumulative beneficial impacts.

Conclusion. Implementation of the NPS preferred alternative would result primarily in beneficial impacts on archeological resources. Identified sites would be preserved and protected in accordance with NPS policies and guidelines. Some adverse impacts could still occur from natural erosion, visitor use, ongoing NPS maintenance operations, new infrastructure development, and other factors; but they are expected to be small. The minimal adverse impacts associated with the NPS preferred alternative would represent a small component of the adverse cumulative impacts, and the notable beneficial impacts as a result of the NPS preferred alternative would represent a reduction of the cumulative adverse impacts. Compared to current conditions, the NPS preferred alternative would result in substantial beneficial impacts on archeological resources primarily because of the efforts to document, monitor, and stabilize resources.

EFFECTS ON ARCHEOLOGICAL RESOURCES: ALTERNATIVE C

Alternative C's focus on enhanced archeological and ethnographic research would result in beneficial impacts to archeological resources. As sites would become better understood, more effective management strategies could be employed to ensure their protection. In addition, actions under alternative C focus on the preservation of existing resources and structures with few new developments on the landscape, and less development and ground disturbance would result in fewer opportunities for the damage to unidentified archeological resources. However, alternative C does propose some development, including the possibility of future infill of structures at Rock Harbor and Barnum Island. These activities could adversely impact buried archeological resources but could be mitigated with appropriate management steps.

Cumulative Impacts. Other past, present, and reasonably foreseeable actions that have adversely affected, or have the potential to adversely affect, archeological resources island-wide would be the same as those described in the no-action alternative.

The impacts associated with implementation of alternative C would have primarily beneficial impacts as a result of continued and expanded NPS archeological management actions to document and protect resources. Adverse impacts on the park's archeological resources would also result from the continued visitor use in areas with potentially sensitive archeological resources. Consequently, the adverse impacts of the other past, present, and reasonably foreseeable actions described above, in combination with the impacts of alternative C, would result in an overall beneficial impact on existing archeological sites (as they are located and protected). The minimal adverse impacts associated with alternative C would represent a small component of the adverse cumulative impacts, and the notable beneficial impacts would represent a large component of the cumulative beneficial impacts.

Conclusion. Implementation of alternative C would result primarily in beneficial impacts on archeological resources. Some adverse impacts could still occur from natural erosion, visitor use, ongoing NPS maintenance operations, new development, and other factors; however, they are expected to be small. The minimal adverse impacts associated with alternative C would represent a small component of the adverse cumulative impact, and the notable beneficial impacts as a result of alternative C would represent a large component of the cumulative beneficial impacts. Overall, alternative C provides the most beneficial impacts to archeological resources over current conditions—mostly because of enhanced and increased research and monitoring and imparts the fewest adverse impacts over current conditions—mostly because of few proposed new ground-disturbing developments in the alternative.

EFFECTS ON HISTORIC STRUCTURES AND ASSOCIATED CULTURAL LANDSCAPES: NO-ACTION ALTERNATIVE

Recreational Resorts and Cottages. The impacts on recreational resorts and cottages are described in terms of the potential to diminish or protect the integrity and/or character-defining qualities that contribute to the national register eligibility of historic properties in the area of potential effect.

Under the no-action alternative, the National Park Service would continue to carry out routine maintenance and manage operations and visitor use activities/services in the park in accordance with existing conditions and policies. Recreational resorts and cottages would continue to be monitored periodically to address safety and resource concerns that may arise over time.

Historic structures in nonwilderness would continue to be maintained by volunteers and NPS staff. Maintaining existing structures would have long-term beneficial impacts on the character of associated historic districts and cultural landscapes. The structures would be preserved and maintained in accordance with The Secretary of the Interior's Standards. The buildings' design and materials, character-defining features, rustic appearance, setting, feeling, and association with recreation in a remote island setting would be maintained. Retaining historic structures would have beneficial impacts on the historic character of associated historic districts and cultural landscapes by retaining the design characteristics that reflect the period of historical significance. Beneficial impacts on the park's historic structures would result from continued professional management actions to maintain, stabilize, and preserve structures and landscapes.

Folk and Commercial Fisheries. Without a framework for preservation of Washington Island structures, the historic buildings would continue to be maintained on a case-by-case basis. This would be a short-term and slight benefit because structures would continue to be maintained intermittently by park VIPs with limited funding and direction.

The Edisen Fishery and all related buildings would continue to be maintained. All buildings and associated features would be preserved. Visitor use would not necessarily increase, and related impacts are expected to be light.

Vernacular Boats. No additional actions beyond those in progress would occur to the management of vernacular boats owned by the National Park Service. The *Tern*, currently being restored to seaworthiness, would be returned to Mott Island. The *Belle* would continue to deteriorate. The stabilization of the *Tern* in accordance with the Secretary of the Interior's Standards will have long-term benefits on preserving the historic fabric and structural integrity of the vessel. Continued deterioration of the *Belle* would result in permanent loss of historic integrity and materials having an adverse impact on the boat.

Lighthouses and Navigational Aids. Preservation maintenance and stabilization of the exteriors of the Rock of Ages Lighthouse and the Rock Harbor Lighthouse would help to preserve the structural integrity of the lighthouses. These efforts would have long-term benefits on the structures by arresting deterioration and loss of building fabric that could threaten their historic appearance and significance. Although the US Coast Guard would continue to own and maintain the Isle Royale Lighthouse, the Passage Island Lighthouse, and the Blake Point Light, National Park Service efforts to assist with the identification of a nonprofit or other government agency (possibly the park itself) to accept ownership of the lighthouses would provide opportunities for technical preservation assistance of the lighthouses having a beneficial impact.

Civilian Conservation Corps, Mission 66, and other NPS Infrastructure. Although the National Park Service would not undertake additional actions regarding the management or preservation of these resources, the park would complete National Register of Historic Places determinations of eligibility for historic buildings that have not yet been evaluated to guide future management actions. Determinations of eligibility would benefit decisions regarding the preservation of contributing or character-defining qualities of significant properties. Continued use of buildings in nonwilderness for administrative, educational, and interpretive purposes would also assist preservation efforts by providing compatible adaptive uses that ensure the continued survival of the structures.

Cumulative Impacts. Other primarily past actions have adversely impacted Isle Royale's historic structures and cultural landscapes. Between the 1940s and the 1980s, the National Park Service removed a large number of buildings and structures associated with recreational resorts, cabins, commercial fisheries and logging operations. Most of the resort buildings at Belle Isle, Minong Lodge, and Singer were removed, along with over half of the Tobin Harbor cottages. Commercial fishing complexes were also removed at Hay Bay, Anderson (Tobin Harbor), Washington Island, Grace Island, Booth Island, and portions of Birch Island. The buildings were not considered historic properties at the time of their removal (primarily in the 1950s); and most were in disuse or had been abandoned for an extended period. Some buildings, including several backcountry ranger cabins, were removed after designation of the Isle Royale Wilderness. Structures at Siskiwit Bay associated with logging operations and later used by the Civilian Conservation Corps were gradually removed from the landscape. The removal and relocation of large numbers of buildings and structures, undertaken largely to reduce the footprint of past human activities in efforts to accentuate the park's natural and wilderness values, had the inadvertent consequence of diminishing the character-defining qualities of the cultural landscapes associated with the former resort and commercial fishing / logging communities. Building removal resulted in a permanent, and somewhat severe, adverse impacts on associated cultural landscapes.

Past and ongoing preservation maintenance for selected historic properties (e.g., recreational cabins, fisheries) is undertaken by the National Park Service and under cooperative agreements between the National Park Service and partners, concessionaires, and volunteers. Agreements such as those with the VIP program, the concessionaire for the Rock Harbor Lodge complex, and Michigan Technological University for the Bangsund Cabin, outline the scope and conditions of the preservation work. The Rock of Ages Lighthouse Preservation Society provides preservation maintenance for the Rock of Ages Lighthouse, and the US Coast Guard conducts remediation work for lighthouses and navigational aids intended for transfer to the National Park Service (e.g., Passage Island Lighthouse, Isle Royale Light). By serving to abate the damaging effects of weathering and other factors on the integrity of historic properties, preservation maintenance undertakings carried out in accordance with The Secretary of the Interior's Standards have had, and continue to have, substantial beneficial impacts on contributing elements of the park's historic structures.

The impacts associated with implementation of the no-action alternative would have beneficial impacts on historic structures associated with ongoing preservation maintenance of selected structures. However, the past removal of structures continues to adversely affect the historic districts and landscapes. Actions described under the no-action alternative would represent a comparatively small component of the adverse cumulative impact associated with past loss, and the beneficial impacts of the alternative would represent a small component of the cumulative beneficial impacts.

Conclusion. Under the no-action alternative, some adverse impacts on the integrity of historic structures would result from the progressive weathering, deterioration and continued underuse of historic structures in nonwilderness. The lack or elimination of coordinated preservation partnership agreements also has the potential to contribute to adverse historic structure impacts as contributing site features deteriorate or receive minimal preservation direction or attention. Beneficial impacts on historic structures would result from the continued efforts to inventory and document historic structures, perform national register eligibility evaluations, and the continued preservation and maintenance of some historic structures.

EFFECTS ON HISTORIC STRUCTURES AND ASSOCIATED CULTURAL LANDSCAPES: ALTERNATE B (PREFERRED ALTERNATIVE):

Recreational Resorts and Cottages. Proposed rehabilitation of resort and recreational structures and landscapes at Barnum Island would contribute long-term benefits to the preservation of key historic structures and the historic setting of the district. Ongoing adaptive reuse of buildings for a variety of support and educational purposes would assist with the preservation and structural integrity of historic buildings and protect historic building fabric and character-defining features of the associated cultural landscape. Restoration and use of the historic Johns Hotel and Johns Cabin in accordance with a historic structures report, an exhibits plan and design, and potentially a historic furnishings report would guide appropriate preservation treatments and use of the buildings. These efforts, undertaken under potential partnerships, would have long-term beneficial impacts on the buildings by ensuring their preservation is undertaken in a fashion that perpetuates their historic significance. Proposed development of trails, picnic facilities, and a permanent dock would represent adverse impacts to the historic landscape design, but could be carried out in a manner that minimizes intrusion on the historic landscape and is compatible with existing architecture.

At Rock Harbor and Barnum Island, the potential for the addition of new or relocated structures into the historic landscapes for interpretation or to meet visitor needs could have adverse effects on their historic landscapes. The addition of new buildings within or adjacent to a potentially historic landscape associated with Mission 66 architecture at Rock Harbor, or among the historic resort landscape at Barnum Island, could adversely affect the historic character of either location. However, it is expected that adherence to guidelines established by cultural landscape treatment recommendations to be developed would likely reduce or eliminate such impacts.

While frequent overnight visitor use of the Rock Harbor Guesthouse may increase wear and tear on the structure's historic fabric, its restoration and the reestablishment of overnight accommodations would improve and preserve the structure's condition as well as restore its historic use, both beneficial to its historic integrity.

Folk and Commercial Fisheries. At Washington Island, the rehabilitation and restoration of key historic structures and cultural landscape features would provide long-term benefits on preserving the historic integrity of structures contributing to the significance of the Washington Island fishery and community. Use of cabins for overnight lodging and other adaptive uses would further ongoing preservation and maintenance objectives by ensuring that the structures are maintained in accordance with the Secretary of the Interior's Standards. Development of interpretive walking trails, a picnic area, and an accessible dock represent adverse impacts to the historic landscape design, but could be carried out in a manner that minimizes impacts to the historic character of the cultural landscape.

Preservation and interpretation proposed for the Edisen Fishery would have long-term benefits on the historic buildings of the site. Adaptive use of selected buildings for occupancy and educational support would be carried out in conformance with the Secretary of Interior's Standards and with the additional technical guidance provided by a cultural landscape report and historical structures reports. Preserved buildings and character-defining features of the cultural landscape such as the clustered spatial arrangement of buildings and patterns of circulation would continue to reinforce the historic character of the traditional fishery. Use of the structures, particularly use associated with the demonstration fishery that is compatible with their original intended design, imparts a beneficial impact by ensuring that the structures retain an active life and usefulness that bolsters their preservation.

Vernacular Boats. Restoration and preservation of historic vernacular fishing boats (*Tern* and *Belle*) would be conducted in accordance with the Secretary of Interior's Standards, and their active use for tours and/or display would further enhance the park's efforts to accurately portray the historic fishery culture. Preservation of the boats would have long-term benefits by enabling their structural integrity to be accurately maintained into the future, and they would further serve as integral components of the fishery cultural landscapes.

Lighthouses and Navigational Aids. Proposed preservation treatments for lighthouses (e.g., restoration of the Rock of Ages Lighthouse and Rock Harbor Lighthouse) would have long-term benefits on the integrity of these significant historic structures by arresting the deterioration or loss of historic fabric and ensuring their structural viability into the future. Following ownership transfer from the US Coast Guard, similar long-term beneficial impacts would result from restoration of the Isle Royale and the Passage Island Lighthouses and support buildings under the guidance provided by historic structure reports and cultural landscape reports to appropriately guide preservation treatments. Additional beneficial impacts would result from new dock replacements or repairs carried out in a fashion that preserves the integrity of associated cultural landscapes.

Cumulative Impacts. Past actions associated with the removal of structures (described under alternative A) have resulted in substantial adverse impacts on historic structures parkwide, although ongoing preservation maintenance of selected structures has resulted in long-term beneficial impacts for those remaining. Alternative B proposes actions that would have substantial beneficial impacts on historic structures, particularly at Barnum and Washington Islands, where plans for adaptive reuse and enhanced visitor opportunities would ensure ongoing preservation and continued use of the structures in ways that complement their historic design. Actions described under the preferred alternative would contribute a large component of the cumulative beneficial impacts. The limited adverse impacts associated with alternative B (primarily associated with modern improvements to cultural landscapes and the potential for new development/infill at Barnum Island and Rock Harbor) would represent a comparatively small component of the adverse cumulative impact.

Conclusion. Under the NPS preferred alternative, beneficial impacts on historic structures and associated cultural landscapes would result from the substantially increased efforts to inventory and document historic structures and landscapes, perform national register eligibility evaluations, and the increase in preservation and maintenance of historic structures, including through their adaptive reuse. These beneficial impacts to historic structures would be substantially greater than then the current conditions. Most of the adverse impacts could be mitigated.

EFFECTS ON HISTORIC STRUCTURES AND ASSOCIATED CULTURAL LANDSCAPES: ALTERNATE C

Recreational Resorts and Cottages. Preservation of historic structures and landscapes on Barnum Island and Rock Harbor would be carried out in accordance with the Secretary of the Interior’s Standards to provide protection of the resources. The beneficial impacts on historic structures and landscapes would be similar to those described in alternative B, resulting from the preservation of key buildings and structures to preserve the overall integrity of the district. However, there would be less potential for adverse visitor use impacts by not allowing day use activities, sailing classes, or overnight accommodations that could result in wear and tear on historic building fabric.

Impacts associated with the potential for future development or infill at Rock Harbor or Barnum Island would be identical to what is described under alternative B.

Folk and Commercial Fisheries. The buildings at Washington Island would be similarly preserved, guided by historic structures reports. Although the cultural demonstration fishery would not be established at the Edisen Fishery, the site could potentially house an artist-in-residence program, scientific researchers, or be used for park administrative purposes. These uses would be compatible with preservation of the character-defining qualities of the fishery site, and completion of a cultural landscape report historic structures report would help ensure that proposed preservation treatments are carried out in a manner that best protects and perpetuates the historic character of the site.

Vernacular Boats. Restoration and ongoing preservation maintenance of the *Tern* and the *Belle*, located at Edisen Fishery, would augment interpretation of vernacular cultural traditions at Edisen Fishery and serve as contributing features of the cultural landscape. Neither vessel would be relocated to the water or operated, which would make ongoing preservation easier to maintain, a beneficial impact. Measures to preserve the structural integrity and interpretive values of the boats would have long-term beneficial impacts on these structures.

Lighthouses and Navigational Aids. Proposed exterior stabilization of the Rock of Ages Lighthouse would be a beneficial impact that preserves defining structural, architectural, and cultural landscape features while arresting ongoing deterioration. The Passage Island Lighthouse and fog signal building would also receive exterior stabilization following transfer from the US Coast Guard to the National Park Service and would receive ongoing preservation maintenance until preservation partners are identified. These measures, carried out in accordance with the Secretary of Interior’s Standards, would have long-term beneficial impacts on the historic buildings and associated cultural landscape features by ensuring that historic fabric does not deteriorate and that the buildings are preserved until such time as other preservation treatments are recommended.

Cumulative Impacts. The primarily past adverse impacts of building removal are described under alternative A, as well as the beneficial impacts on buildings resulting from ongoing preservation maintenance and partnership agreements.

Alternative C proposes actions that would have primarily beneficial impacts on historic structures, particularly at Barnum and Washington Islands, where plans for preservation of resources ensure their protection into the future. The adverse actions described under the alternative (primarily associated with impacts associated with introducing relocated historic structures into or adjacent to dissimilar historic districts) would represent a comparatively small component of the adverse cumulative impact associated with past loss, but the beneficial impacts of the alternative would represent a large component of the overall beneficial impacts.

Conclusion. Under alternative C, long-term beneficial impacts on historic structures would result from the implementation of preservation treatments and some adaptive uses that protect and preserve the defining architectural features and attributes of structures and landscapes. However, the beneficial impacts to historic structures and their associated landscapes from actions in alternative C would not be as extensive as those realized under alternative B, mostly because of more limited application (i.e., exterior-only restorations and fewer adaptive reuses).

EFFECTS ON ETHNOGRAPHIC RESOURCES: NO-ACTION ALTERNATIVE

Under the no-action alternative, no substantial changes to visitor use activities or proposed construction of new park facilities would occur. Consequently, known or potential ethnographic resources are unlikely to be affected by ground-disturbing construction or other activities that could intrude on culturally sensitive sites. NPS archeologists and other cultural resource specialists would continue to monitor the conditions of known ethnographic resources and undertake appropriate protection measures as necessary to reduce or avoid adverse impacts possibly occurring from weathering and natural erosion, visitor use (e.g., the development of social trails or other inadvertent impacts), the illegal removal of artifacts, and other factors.

The National Park Service would continue to consult on a government-to-government basis with the Ojibwe and associated tribal groups to identify ethnographic landscapes, traditional cultural and archeological sites, cultural practices, and other ethnographic resources of tribal importance. Under existing laws and policies, NPS staff would ensure that culturally sensitive information is protected and that traditional access is maintained to culturally important resources and areas to enable the perpetuation of cultural practices and lifeways. The above measures would result in long-term beneficial impacts on ethnographic resources by expanding the documentation, understanding, and management of resources of enduring cultural value to the Ojibwe and other tribal groups. Long-term beneficial impacts to ethnographic resources and cultural connections would also result by ensuring traditional access to these resources is retained and treaty rights and obligations are clarified and affirmed.

Ethnographic resources associated with the Scandinavian-American folk fishery tradition would also continue to be documented and protected under the no-action alternative. NPS staff would consult with traditionally associated Scandinavian-American fishermen to identify traditional cultural sites, water routes, archeological sites, landscapes, traditional practices, and other culturally significant resources and features. Information documented through ongoing consultation would greatly increase the park's understanding of significant ethnographic resources associated with the folk fishery tradition, enabling NPS managers to better protect these resources and preserve the knowledge and cultural connections of particular places to associated groups. These measures would have long-term beneficial impacts on ethnographic resources by protecting, interpreting, and contributing to the continuation of cultural lifeways and practices associated with the folk fishery culture and traditional ecological knowledge related to maritime life on and around Isle Royale.

Cumulative Impacts. Other past, present, and reasonably foreseeable actions have affected, or have the potential to affect, Isle Royale's ethnographic resources. Although the park's ethnographic resources are not well documented, there is a probability that many precontact and historic American Indian archeological sites retain enduring cultural value for the contemporary Ojibwe and associated tribal groups. Culturally important archeological sites often have value as traditional or sacred/ ceremonial places that continue to link tribes to particular geographic areas. Consequently, previous ground-disturbing development or human activities on Isle Royale may have inadvertently disturbed ethnographic resources, particularly resources and locations that have been used or valued by different cultural groups at different times (e.g., copper mine sites used by indigenous peoples and later European Americans; precontact trails later adapted as wagon roads). Isle Royale's coastal resorts and fishing communities and modern campgrounds (primarily along the coast and by inland lakes) are commonly in places used by precontact and historic period peoples. Archeological and ethnographic resources at these locations would likely have been disturbed by development and continue to be at risk from increased site visitation, social trails, and other factors that could diminish resource integrity. Although the occurrence and distribution of culturally important plants at Isle Royale are mostly undocumented, such plants (e.g., sugar maple, devil's club) may continue to be inadvertently disturbed by visitor use or development. Disturbance and reduced or curtailed access to resources and places having cultural importance to the Ojibwe and associated tribal groups would have adverse impacts on ethnographic resources.

Places and resources important to those associated with Isle Royale's Scandinavian-American folk fishery tradition and their descendants have been and will continue to be affected by actions. As traditionally associated people whose livelihoods were intimately connected to the commercial fishing industry, their fortunes rose and then fell along with the profitability and abundance of Lake Superior's fish stocks. Although a small number of individuals remain associated with Isle Royale's folk fishing culture, the creation of the national park, the sea lamprey invasion that depleted commercial fish populations, greater economic opportunities on the north shore of Lake Superior, and the post-lamprey initiation of limited "assessment fishing" for research purposes, have all contributed to alter or diminish the once thriving commercial fishing community. The deterioration and loss of abandoned former residences and other buildings associated with the commercial fishing complex, the loss of traditional fishing boats and vernacular boat-building skills, and the general decline in the collective environmental and cultural knowledge of those associated with the folk fishery tradition, have resulted in adverse impacts on ethnographic resources.

The impacts associated with implementation of the no-action alternative would be beneficial to ethnographic resources through continuing efforts to identify, document, and preserve places and resources of enduring cultural value to the Ojibwe and Scandinavian-American folk fishery tradition. Other past, present, and future actions associated with disturbance of important cultural sites and the deterioration and removal of historic structures have diminished the connections of traditionally associated peoples to places and resources of cultural importance, resulting in some adverse impacts on ethnographic resources. Impacts associated with the no-action alternative are primarily beneficial, but some adverse impacts may continue (associated with continued limitations on access and possible loss of unidentified resources). Cumulatively, the impacts associated with the no-action alternative would represent a small component of the adverse cumulative impact.

Conclusion. Under the no-action alternative, long-term beneficial impacts on ethnographic resources would result from the identification, documentation, and preservation of places and resources of enduring cultural value to the Ojibwe and the Scandinavian-American folk fishery tradition. Information documented through ongoing consultation with tribal and traditionally associated peoples would expand the park's understanding of significant ethnographic resources and enable NPS managers to better protect culturally important resources and places. Although inadvertent visitor use impacts and other disturbances could occur, these would contribute only a small component of the adverse cumulative impact.

EFFECTS ON ETHNOGRAPHIC RESOURCES: ALTERNATIVE B (PREFERRED ALTERNATIVE)

In addition to the actions identified under the no-action alternative, increased documentation and research of Ojibwe culture and lifeways, including fishing practices at Isle Royale, would benefit the park's understanding of associated ethnographic resources. Information provided in consultation with Ojibwe elders and knowledge bearers would assist park staff with efforts to identify significant resources and to manage them in a fashion that respects traditional access and uses while avoiding inadvertent disturbances and inappropriate visitor access.

Cumulative Impacts. The primarily past adverse impacts on ethnographic resources from development disturbance, visitor use and other factors are described under alternative A.

The impacts associated with implementation of alternative B would be primarily beneficial to ethnographic resources through enhanced efforts to identify, document, and preserve places and resources of enduring cultural value to the Ojibwe. Other past, present, and future actions associated with disturbance of important cultural sites and other factors have diminished the connections of traditionally associated peoples to places and resources of cultural importance, an adverse cumulative impact on ethnographic resources. The beneficial impacts to ethnographic resources associated with alternative B represent an overall improvement to the resource.

Conclusion. Under alternative B, long-term beneficial impacts on ethnographic resources would be further enhanced in comparison with current conditions. These improvements would be from more concerted efforts to identify, document, and preserve places and resources of enduring cultural value to the Ojibwe. Information documented through ongoing consultation with tribal and traditionally associated peoples would expand the park's understanding of significant ethnographic resources and enable NPS managers to better protect culturally important resources and places. Although inadvertent visitor use impacts and other disturbances could occur, these would contribute only a small component of the adverse cumulative impact.

EFFECTS ON ETHNOGRAPHIC RESOURCES: ALTERNATIVE C

Under alternative C, the park would focus on expanded ethnographic research opportunities on traditionally associated Ojibwe and the Scandinavian-American folk fisherman. Increased documentation and understanding of ethnographic resources would have long-term beneficial impacts.

Cumulative Impacts. The primarily past adverse impacts on ethnographic resources from development disturbance, visitor use, and other factors are described under alternative A.

The impacts associated with implementation of alternative C would be primarily beneficial to ethnographic resources through continued efforts to identify, document, and preserve places and resources of enduring cultural value to the Ojibwe and Scandinavian-American folk fishery tradition. Actions associated with the disturbance of important cultural sites and the deterioration and removal of historic structures have and will continue to diminish the connections of traditionally associated peoples to places and resources of cultural importance, resulting in adverse impacts on ethnographic resources. The beneficial impacts to ethnographic resources associated with alternative C represents an overall improvement to the resource.

Conclusion. Under alternative C, beneficial impacts on ethnographic resources would result from enhanced efforts to identify, document, and preserve places and resources of enduring cultural value to the Ojibwe and the Scandinavian-American folk fishery tradition. Information documented through ongoing consultation with tribal and traditionally associated peoples would expand the park's understanding of significant ethnographic resources and enable NPS managers to better protect culturally important resources and places. Although inadvertent visitor use impacts and other disturbances could occur, these would contribute only a small component of the adverse cumulative impact.

EFFECTS ON VISITOR USE AND EXPERIENCE: NO-ACTION ALTERNATIVE

In the no-action alternative, visitors would continue to access a diversity of cultural resources in a wide range of settings throughout Isle Royale National Park. In most cases, there would be largely no change in visitor access to the majority of cultural resources. For example, visitors would have continued access to highly valued opportunities such as the wayside at the Smithwick Mine, the trails and signs around Minong Mine, Rock Harbor lighthouse, Passage Island lighthouse, and Edisen Fishery.

A variety of educational and interpretive personal and nonpersonal services related to cultural resources would continue to be offered throughout the park. For example, the Edisen Fishery would continue to serve as an interpretive site for visitors to learn about folk fisherman. Visitors have expressed interest in continued interpretive and educational opportunities related to the park's cultural resources. This alternative would provide fewer of these opportunities than the NPS preferred alternative.

Overall, if current conditions are maintained, which generally allow most visitors a high degree of freedom to access the cultural resources and interpretive services of the park, there would be a long-term and beneficial impact for visitor use and experience.

Cumulative Impacts. Implementation of the no-action alternative would have primarily beneficial impacts as a result of continued unfettered access to many of the important resources of Isle Royale National Park. Other past, present, and reasonably foreseeable actions have contributed beneficial effects to visitor use and experience. Consequently, the impacts of the other past, present, and reasonably foreseeable actions described above, in combination with the impacts of the no-action alternative, would result in long-term beneficial cumulative impacts on visitor use and experience. The impacts associated with the no-action alternative would represent a small component of the long-term beneficial cumulative impacts.

Conclusion. Implementation of the no-action alternative would result primarily in long-term and beneficial impacts to visitor use and experience because of the continued opportunities for unfettered access to important resources of the park.

EFFECTS ON VISITOR USE AND EXPERIENCE: ALTERNATIVE B (NPS PREFERRED ALTERNATIVE)

As part of the NPS preferred alternative, there would be increases in visitor access to the diversity of cultural resources in a wide range of settings throughout Isle Royale National Park when compared to current conditions and the other alternatives presented in this CRMP/EA. Under alternative B, visitors would have increased access to some cultural resources of the park through partnerships intended to protect resources that are important to the visitor experience. Some examples of increased access include new guided dive tours to shipwrecks, day and overnight access at Barnum and Washington Islands, public lodging at the Rock Harbor Guesthouse, access to new interpretive opportunities at the Johns Hotel and Johns Cabin, and on-site interpretation at the hand-hewn interpretive cabin at the Minong Mine site. The increase in visitor access and opportunities provides beneficial impacts to visitor use and experience as visitors connect to the park's fundamental resources and values such as the archeological and ethnographic resources that illustrate the interaction of human culture and nature at Isle Royale.

Visitor access is currently allowed on Barnum and Washington Islands but is not encouraged or accommodated by facilities, information, interpretation, or transportation options other than those provided by the individuals under volunteer agreements. Under alternative B, changes to visitor access on Barnum Island include the provision of overnight lodging for educational participants, interpretive walking trails, picnic and pit toilet facilities, and accessible docks. These changes have a beneficial impact on visitor use and experience as they provide more services, opportunities, and experiences. Other actions included under alternative B, such as adaptive reuse of an existing boat house, also have beneficial impacts on visitor use through new opportunities. Some of the changes to picnic and toilet facilities as well as modifications to docks would occur in a cultural landscape and could have a minor adverse effect those visitors seeking to see the cultural landscape unmodified. On Washington Island, overnight visitor cabin rentals would be provided, with other day use visitor opportunities available such as an interpretive walking trail. A new dock would be constructed that would provide additional access. Access to archeological and ethnographic resources of the park that illustrate the interaction of human culture and nature at Isle Royale have been identified as a major component of the visitor experience. Increased access to these important resources of Isle Royale would have a large beneficial impact to visitor use and experience.

Currently, visitors have access to the interior of the Rock Harbor Lighthouse. Alternative B would allow interior visitor access to the other three lighthouses, including the possibility of overnight stays at the Isle Royale Light. These actions provide large beneficial impacts to visitor opportunities to experience cultural resources.

The possibility of future infill of new or relocated structures at Barnum Island or Rock Harbor would provide beneficial impacts to visitor use and experience by increasing day and potentially overnight opportunities as well as enhancing interpretation options.

Existing visitor opportunities would be continued under alternative B as well. For example, visitors would still be able to explore shipwrecks at recreational dive sites after obtaining a dive permit from NPS staff. Visitors would also have continued access to hiking trails along the park's historic trails and wagon roads. These opportunities are highly valued opportunities for visitors to the island.

The continued and expanded interpretive and educational opportunities related to cultural resources under this alternative would have a long-term and notable beneficial impact to visitor use and experience, as visitors have expressed interest in increased interpretive and educational opportunities. Visitors also have expressed interest in more on-site interpretive materials and programs, access to park collections, and integration of the collection into interpretive and educational programming and facilities.

In addition to increased interpretation and education opportunities, alternative B also includes immersive and experiential opportunities that increase access and foster important and direct connections to park resources. These include recreational opportunities through fishery permits at Washington Island, guided dive tours, and boat tours on historic vernacular boats.

Overall, the NPS preferred alternative provides continuation of visitor access to a diversity of cultural resources at the park and allows an increase in access to a number of resources as noted above. The alternative provides substantial beneficial impacts from all the new opportunities for visitor access achieved through partnerships.

Cumulative Impacts. The past and ongoing actions that contribute to the cumulative impacts would be the same as those described under the no-action alternative. The impacts associated with implementation of alternative B would have primarily long-term, slight beneficial impacts as a result of continued unfettered access to many of the important resources, and increased access and interpretive and educational opportunities. Other past, present, and reasonably foreseeable actions have contributed to visitor use and experience and would continue to provide slight beneficial impacts to visitor use and experience. Consequently, the beneficial impacts of the other past, present, and reasonably foreseeable actions described above, in combination with the impacts of alternative B, would result in beneficial cumulative impacts on visitor use and experience. The impacts associated with alternative B would represent a large component of the beneficial cumulative impacts.

Conclusion. Long-term beneficial cumulative impacts on visitor use and experience would result from the implementation of alternative B in conjunction with other past, present, or reasonably foreseeable actions. Compared with the other alternatives and current conditions, alternative B would result in impacts that are more beneficial to visitor use and experience primarily because of the efforts to continue and increase visitor access and opportunities for interpretation and education of the important resources of Isle Royale National Park.

EFFECTS ON VISITOR USE AND EXPERIENCE: ALTERNATIVE C

The focus of alternative C is to ensure sound management and enhance understanding fundamental resources and values. Visitors would continue to access a diversity of cultural resources in a wide range of settings throughout Isle Royale National Park. In most cases, there would be largely no change in visitor access to the majority of cultural resources. Visitor access under alternative C would be similar to the no-action alternative. For example, visitors would continue to be able to access a number of historic mining sites on the island and continue exploration of the park's shipwrecks at recreational dive sites after obtaining a dive permit from NPS staff. The continuation of access is part of the unfettered access to the resources of Isle Royale and is important to support visitor use and experience.

The possibility of future infill of new or relocated structures at Rock Harbor or Barnum Island would have the same impacts as described under alternative B.

Overall, alternative C would provide less visitor access than the NPS preferred alternative with minimal access and minimal adaptive re-use. Nevertheless, the park will continue to offer variety of educational and interpretive personal and nonpersonal services related to cultural resources and also offer some new opportunities as described in alternative B, such as those associated with potential infill at Rock Harbor and Barnum Island. Educational and interpretive services are important to a visitor's experience and have a beneficial impact to visitor use and experience. For instance, visitors would have opportunities to view the *Tern* and the *Belle*, located at Edisen Fishery, and enhance their understanding of vernacular cultural traditions at Edisen Fishery. Although the *Tern* and the *Belle* would be restored and maintained to augment interpretation, some interpretation and educational opportunities would be eliminated. For instance, enhanced opportunities like the cultural demonstration at Edisen Fishery would no longer be available. Reduced opportunities for visitors to connect to important stories of Isle Royale has an adverse impact on visitor use and experience.

Overall, visitor access under alternative C would be similar to the no-action alternative, with a few exceptions, and would provide less visitor access than the NPS preferred alternative. Interpretation and education opportunities would continue with a few additional opportunities in alternative C than in the no-action alternative. For example, visitors would have access and the opportunity to view, learn about and potentially become involved in archeological fieldwork in this alternative. Overall, there are fewer interpretation and education opportunities available in alternative C than in the NPS preferred alternative.

Cumulative Impacts. The past and ongoing actions that contribute to the cumulative impacts would be similar to those described under the no-action alternative. The impacts associated with implementation of alternative C would have primarily beneficial impacts as a result of continued unfettered access to many of the important resources and the continuation of many of the existing interpretive and educational opportunities. Other past, present, and reasonably foreseeable actions have contributed to visitor use and experience. Consequently, the impacts of the other past, present, and reasonably foreseeable actions described above, in combination with the impacts of alternative C, would result in long-term beneficial cumulative impacts on visitor use and experience. The impacts associated with alternative C would represent a small component of the beneficial cumulative impacts.

Conclusion. Long-term beneficial cumulative impacts on visitor use and experience would result from the implementation of alternative C in conjunction with other past, present, or reasonably foreseeable actions. By providing these additional opportunities for interpretation and education, alternative C would result in a beneficial impact to visitor use and experience; however, the opportunities for visitor use and experience provided in this alternative are fewer than the NPS preferred alternative and similar to the no-action alternative.

Chapter 4

CONSULTATION AND COORDINATION





CHAPTER 4: CONSULTATION AND COORDINATION

The NPS planning team has consulted with several federal and state agencies, tribes, interested stakeholders, and the public throughout this planning process. Formal consultation letters were sent in September and October 2013, at the beginning of this planning process, to tribes and regulatory agencies.

Nontribal Section 106 Consultation with the Michigan State Historic Preservation Office and Advisory Council on Historic Preservation

Agencies that have direct or indirect jurisdiction over historic properties are required by section 106 of the National Historic Preservation Act to take into account the effect of any undertaking on properties listed or eligible for listing in the National Register of Historic Places. Before this planning process formally began, the planning team held four public listening sessions in the winter of 2010 in Minneapolis, Minnesota; Duluth, Minnesota; Houghton, Michigan; and East Lansing, Michigan. The Minnesota State Historic Preservation Office was sent a letter as a courtesy to inform them of the upcoming CRMP/EA and to notify them of the listening sessions in their state. To initiate formal consultation to meet the requirements of 36 CFR 800, the National Park Service sent letters to the Michigan State Historic Preservation Office and the Advisory Council on Historic Preservation on September 20, 2013, inviting their participation in this planning process. A copy of the draft CRMP/EA was sent to the Michigan State Historic Preservation Office.

A meeting of consulting parties related to National Historic Preservation Act, section 106, was held in Duluth, Minnesota, on November 21, 2013. In addition to the Michigan State Historic Preservation Office, attendees at this meeting included NPS staff, representatives from the Isle Royale Families and Friends Association, North Shore Commercial Fishing Museum, Michigan Historic Preservation Network, and the National Trust for Historic Preservation. Notes from this meeting are available online on the Isle Royale National Park PEPC website.

A follow-up section 106 consulting party meeting was held via conference call on April 10, 2014, to provide updates on the project and discuss any concerns related to section 106. In addition to the state historic preservation office, attendees at this meeting included NPS staff, representatives from the Isle Royale Families and Friends Association, North Shore Commercial Fishing Museum, Michigan Historic Preservation Network, and the Advisory Council on Historic Preservation.

After considering a request by the section 106 consulting parties, the National Park Service began working with the US Institute for Environmental Conflict Resolution to hire a third-party neutral facilitator to continue and coordinate the section 106 consultation process. Through conversations with the US Institute for Environmental Conflict Resolution, the National Park Service decided that the facilitated section 106 consultation would include both the CRMP/EA and the WSP/SEIS. During fiscal year 2016, the details of the section 106 consultation process were confirmed.

The Sierra Club and Wilderness Watch also requested status as consulting parties in August 2016, noting their interest in the undertaking and its effect on historic properties—the National Park Service approved their request.

On August 8, 2016, the section 106 facilitator held a teleconference/webinar with the National Park Service and consulting parties to clarify the 106 process, involving a series of remote webinars and face-to-face meetings and to respond to questions on the process. Subsequent section 106 meetings were held on September 28-29, 2016; November 21, 2016; November 28-30, 2016; March 6-8, 2017; May 3, 2017; and August 14-16, 2017. On September 28 and September 29, 2016, an in-person meeting was held in Houghton, Michigan, to discuss issues related to the identification of historic properties.

Section 106 consulting parties, including wilderness groups, the Advisory Council on Historic Preservation, the state historic preservation office, Isle Royale Families and Friends Association, and others, will be provided a copy of this draft environmental assessment for review. Consultation will continue with these parties concerning the actions associated with cultural resources in wilderness throughout the development of the Wilderness Stewardship Plan / Supplemental Environmental Impact Statement.

Consultation with American Indian Tribes

The National Park Service recognizes that indigenous peoples may have traditional interests and rights in lands now under NPS management. Related American Indian concerns are sought through consultations. The need for government-to-government Native American Consultation stems from the historic power of Congress to make treaties with American Indian tribes as sovereign nations. Consultations with American Indians are required by various federal laws, executive orders, regulations, and policies. They are needed, for example, to comply with section 106 of the National Historic Preservation Act. Implementing regulations of the Council on Environmental Quality for National Environmental Policy Act also call for American Indian consultations.

Isle Royale National Park is in the area covered by the 1842 Treaty of LaPointe and the 1844 Isle Royale compact and therefore consults with tribes who were signatories of that treaty.

In November 2010, letters were sent to the following Lake Superior Chippewa Tribes to announce the start of this CRMP/EA, inform them of the public listening sessions, and to invite their participation in this planning process—Red Cliff, Bad River, Lac Courte Oreilles, Lac du Flambeau, Keweenaw Bay, Lac Vieux Desert, Fond du Lac, Grand Portage, and Milles Lacs. A consultation meeting was held in December 2010 in Duluth, Minnesota, with the Grand Portage and Bois Forte Tribal Historic Preservation Officers to discuss this CRMP/EA. The park followed up with a letter in December 2010 formally inviting Bois Forte to participate in this planning process because of their close connection to Grand Portage and Isle Royale.

Invitation letters to an April 2011 meeting in Duluth, Minnesota, were sent to the above-listed tribes with the addition of Sault Ste. Marie and Bay Mills as additional Lake Superior Chippewa tribes in Michigan. Milles Lacs and Bad River sent representatives to the consultation meeting held on April 28, 2011, in Duluth, Minnesota. Grand Portage and Bois Forte were invited to visit the island in the summers of 2011 and 2012, but the tribal historic preservation officers and tribal chairmen could not fit visits into their schedules.

Newsletter 1 was sent to the tribes in November 2011 to keep them informed of this planning process. Tribes were informed of the traditionally associated people determination by e-mail letter in August 2012. The letter noted that “This determination does not change or impact any treaty rights that exist at Isle Royale or the government-to-government relationship we share.”

During a team meeting in Grand Portage, Minnesota, in April 2013, the planning team met with the Grand Portage Tribal Council to discuss this CRMP/EA and associated resources. When the Notice of Intent was published in June 2013, tribes were notified by letter, updated on this CRMP/EA, and informed of the upcoming public meetings. A letter with updates on the section 106 and NEPA process was sent in September 2013 and newsletter 2 was mailed to them in November 2013 with an offer to meet in December 2013 or January 2014.

A consultation meeting was held in February 2014 in Grand Portage, Minnesota, with the tribal council. One item on the agenda was a discussion of the CRMP/EA draft preliminary alternates. Also in February 2014, a meeting was held at the Grand Portage National Monument visitor center for the Grand Portage community to discuss Isle Royale and this document.

A consultation meeting was held with the Grand Portage tribal council on January 11, 2016. The tribe was briefed on the NPS preferred alternative. In July 2016, park staff attended a meeting of the Great Lakes Indian Fish and Wildlife Commission Voigt Intertribal taskforce. The CRMP/EA was discussed and the tribes were invited to attend consultation meetings in the fall to review and discuss this document and alternatives.

Tribes were invited to participate in meetings in the fall of 2016 and winter of 2017 to review CRMP/EA alternatives. Tribes will be provided a copy of this draft environmental assessment as well as the draft programmatic agreement described above for review. The park will continue to consult with tribes throughout the remainder of the process and during implementation of the CRMP/EA preferred alternative. Consultation will also continue with tribes concerning the actions associated with cultural resources in wilderness throughout the development of the Wilderness Stewardship Plan / Supplemental Environmental Impact Statement.

Section 7 Consultation with the US Fish and Wildlife Service

The Endangered Species Act of 1973, as amended, requires in section 7(a)(2) that each federal agency, in consultation with the Secretary of the Interior, ensure that any action the agency authorizes, funds, or carries out is not likely to jeopardize the continued existence of a listed species or result in the destruction or adverse modification of designated critical habitat. This section of the act sets out the consultation process, which is further implemented by regulation (50 CFR Part 402).

During the preparation of this CRMP/EA, NPS staff informally consulted with the US Fish and Wildlife Service East Lansing Michigan Field Office. The National Park Service contacted the field office in a letter dated October 1, 2014. The letter advised the office that Isle Royale National Park was undertaking the development of a CRMP/EA and initiated informal consultation on this document. The letter included a list of species listed or proposed for listing in Keweenaw County, Michigan, which includes Isle Royale National Park, as of August 5, 2014, and requested concurrence on this list. The US Fish and Wildlife Service responded on November 25, 2014, and agreed with the list of species that inhabit or may inhabit the park.

NPS staff subsequently checked the US Fish and Wildlife Service's Environmental Conservation Online System (ECOS) Information for Planning and Conservation website to ensure this species list has not changed. Since that time, the endangered gray wolf was relisted, effective December 19, 2014, and the northern long-eared bat status changed from a proposed threatened species to a formally listed threatened species, effective April 2, 2015. The US Fish and Wildlife Service provided an updated list of threatened and endangered species that may occur in the proposed project location and/or may be affected by the project, dated July 23, 2015.

For reasons discussed in Impact Topics Considered but Dismissed, the National Park Service has determined that there would be no adverse impact to threatened and endangered species. The US Fish and Wildlife Service will be provided a copy of this draft environmental assessment.

Agencies, Organizations and Individuals Receiving a Copy of This Document

FEDERAL AGENCIES

US Fish and Wildlife Service, Ecological Services,
East Lansing Field Office

US Environmental Protection Agency

Advisory Council on Historic Preservation

TRIBAL GOVERNMENTS

1854 Authority

Keweenaw Bay Indian Community

Lac Vieux Desert Band of Lake
Superior Chippewa

Bay Mills Indian Community

Sault Tribe of Chippewa Indians

Fond du Lac Band of Lake Superior Chippewa

Grand Portage Band of Lake Superior Chippewa

Mille Lacs Band of Ojibwe

Minnesota Chippewa Tribal Executive Committee

Bois Forte Band of Chippewa

Bad River Band of Lake Superior Chippewa

Lac Courte Oreilles Band of Lake
Superior Chippewa

Lac du Flambeau Band of Lake
Superior Chippewa

Red Cliff Band of Lake Superior Chippewa

St. Croix Chippewa Indians of Wisconsin

Sokaogon Mole Lake Chippewa Community

Great Lakes Indian Fish and Wildlife Commission

STATE GOVERNMENTAL AGENCIES

Michigan Department of Natural Resources

Michigan State Historic Preservation Office

Michigan Office of the Governor

ORGANIZATIONS/OTHERS

Clean Wisconsin

Forever Resorts

Friends of the Boundary Waters

Grand Portage Isle Royale Transportation Line

Isle Royale and Keweenaw Parks Association

Isle Royale Boaters Association

Isle Royale Institute

Isle Royale Seaplanes

Isle Royale Line, Incorporated

Keweenaw Chamber of Commerce

Madison Audubon Society

Michigan Technological University

Michigan United Conservation Club

National Parks Conservation Association

National Wildlife Federation

Park Employees for Environmental Responsibility

Sierra Club

The Wildlife Society

Upper Peninsula Environmental Coalition

Wilderness Society

Wilderness Watch

Wisconsin League of Conservation Voters

REFERENCES





REFERENCES

National Park Service, US Department of the Interior (NPS)

- 2016 "Foundation Document." Isle Royale National Park. 96 pp.
- 2015 National Park Service NEPA Handbook. Washington, D.C.
- 2006 NPS Management Policies 2006.
- 2000 "Long-Range Interpretative Plan." Isle Royale National Park.
- 2001 Director's Order 12: Conservation Planning, Environmental Impact Analysis, and Decision-making. Washington, D.C.
- 1998 "General Management Plan and Environmental Impact Statement." Isle Royale National Park. 240 pp.

APPENDIXES





APPENDIX A: NPS POLICY AND BEST PRACTICES FOR CULTURAL RESOURCE MANAGEMENT AT ISLE ROYALE.

NPS Management Policies

The management of the National Park Service is guided by and consistent with public laws, treaties, proclamations, Executive Orders, regulations and directives of the Secretary of the Interior and the Assistant Secretary for Fish and Wildlife and Parks. Isle Royale National Park is required to manage the park cultural resources in adherence with these federal standards and NPS *Management Policies 2006*. Select management policies that are central to this CRMP/EA are summarized below. The following list is not exhaustive:

- Location of any new development would be sited to minimize harm to known cultural resources.
- Research would be completed to determine National Register of Historic Places eligibility of park resources/sites.
- Previously recorded historic and archeological sites would continue to be monitored, preserved, and protected. Related data would tie into the park's developing geographic information system (GIS) and ASMIS database.
- Historic mining resources would continue to be documented and conditions monitored on a scheduled basis (LiDAR remote sensing technology would be used where available).
- The National Park Service would develop a policy and protocol for accommodating Ojibwe traditional use of the island.
- The park would continue to identify cultural items that are subject to the Native American Graves Repatriation Act in the Isle Royale National park collection and determine their cultural affiliation.

The National Park Service would consult with Indian tribes regarding human remains and associated funerary objects and repatriate these items as appropriate.

- Natural resource museum collections, including associated records, located at nonfederal repositories and universities and collected through research permits would be identified and prioritized for accessioning and cataloging.
- The park museum backlog would be fully cataloged.

Best Practices

Day-to-day maintenance, resource management, and research activities have little potential for environmental impacts and do not require an environmental assessment for the park to pursue. These “best practices” for the management of cultural resources are sourced in NPS policy and can be considered potential actions that would be implemented as park staffing and resources are available.

DOCUMENTATION AND PRESERVATION

- Increased efforts would be made to identify and conserve objects in the field where significant and practicable (e.g., Island Mine steam hoist, Wendigo wagons).
- Condition assessment and stabilization analysis would be conducted and subsequent stabilization done to improve the powder house at Senter Point as an interpretive site.
- A shipwreck monitoring strategy would be developed and implemented.
- All shipwrecks would be monitored intermittently using an array of modern technology such as remotely operated underwater vehicles, digital scans, photogrammetry, LiDAR, and 3-D imaging. These efforts could be done with the NPS Submerged Resources Center or other potential partners.
- The National Park Service would identify precise cemetery and burial site locations island-wide, with specific emphasis on locations where campgrounds or other park developments exist.
- Implement treatment recommendations from the historic logging study, as appropriate (survey completed by MWAC in 2016; study forthcoming).
- Historic preservation specialists would be engaged to help develop a protocol for the long-term maintenance and storage of select small boats owned by the National Park Service and indigenous to Lake Superior-Isle Royale waters (gas boats and herring skiffs). These may include sheltered display on or off the island.
- The hardware and engines of the NPS-owned vernacular boats would be evaluated, conservation measures would be taken where possible, and significant items could be accessioned as museum objects.
- Condition assessments would be undertaken for those NPS-owned vernacular boats that could be preserved, restored, reconstructed, or stabilized.

PARTNERSHIPS/COLLABORATION/VIP

- Partners would be established under official agreements. Agreement types could include General Agreements, Philanthropic Partnership Agreements, Cooperative Agreements, or other formats depending on the nature of the partnership activities. Partnerships would focus on preservation of historic structures in nonwilderness as well as enhanced public education and interpretation activities parkwide.
- Partners or collaborators could help the park complete a submerged cultural resource inventory/survey.
- Through a partnership, the park would attempt to purchase or have an authentic hook line made by knowledgeable fishers and have fishers explain its use.

CONSULTATION

- The Ojibwe would be encouraged to participate in archeological research.
- The park would seek a legal opinion to determine which tribes hold treaty rights.
- As part of the documentation of the park's administrative history, the park would research decisions made through time to temporarily continue folk commercial fishing after the creation of the park until the lamprey times and, subsequent fishing post-lamprey era.

MUSEUM COLLECTIONS

- Materials in the collection that do not fit within the scope of collections statement would be deaccessioned.
- As the 1977 special use permits allowing occupancy of historic structures expire, the National Park Service would confirm the status of personal property at relevant sites and arrange for possible donations, if appropriate.
- Following the expiration of a residential special use permit, including under scenarios in wilderness, all associated objects within and around the structure would be photographed and recorded *in situ*. Objects within the scope of collections would be acquired by field collection or donation and added to the museum collection. If objects are still private property, permission would be sought to photograph and record the objects in situ.
- The 2016 scope of collections statement may be revised to reflect changing park collection priorities, including the importance of preserving significant items related to all cultural resource categories represented at Isle Royale. The revised scope of collections statement would ensure that the full story of human activity be materially represented by significant items (artifacts, archival material, natural history collections, art and history objects, and oral histories). It would provide for the preservation and management of these resources and their use in museum exhibits, interpretive programs, and public and scholarly research.
- The existing collection would be evaluated and the focus of any new collection effort would be on items associated with fundamental resources from categories that are currently underrepresented. Some items that are duplicates and from categories well represented in the collection could be considered for deaccessioning.

APPENDIX B: CULTURAL RESOURCE INVENTORY AND EVALUATION NEEDS

Compliance with Section 110 and Section 106 of the National Historic Preservation Act requires that Isle Royale National Park identify and evaluate historic properties that are eligible for listing on the National Register of Historic Places. In addition, NPS policies require differing documentation efforts for historic properties associated with their use and treatments. And finally, documentation of historic properties is needed to fulfill the park's mission to inspire and educate the public about the resources it was created to preserve. A variety of documentation needs are required to carry out the preferred alternative of the CRMP/EA as well as meet the basic needs and requirements of the National Park Service. Documentation types and efforts include:

National Historic Landmark Documentations

- Minong Mine (prehistoric and historic significance) (in progress)
- Island Mine (preliminary analysis)
- Fisheries (preliminary analysis)

National Register of Historic Places Determination of Eligibility/Nominations

- Senter Point powder house ruins and steam hoist engine
- Historic recreational resort and cottage properties on the park List of Classified Structures and Cultural Landscape Inventory including:
 - » Charles S. Horner Cottage
 - » Tobin Harbor Historic District (national significance update)
- Cabin "A" on Washington Island
- Lighthouses NRHP update to include associated cultural landscape features
- Original Malone Bay Ranger Station
- Mission 66-era resources including:
 - » Mott Headquarters complex
 - » Rock Harbor complex
 - » *Ranger III*
 - » Adirondack-style camp shelters
 - » Mount Ojibway Firetower, Ishpeming Firetower, and Feldtmann Firetower
 - » Siskiwit River Bridge
- Bangsund Fishery (association with wolf-moose research)
- Moose exclosures
- Traditional cultural property multiple property nomination for fisheries
- Traditional cultural property nomination for important spawning ground and fishing grounds for select species, including McCargoe Cove

Cultural Landscape Inventories and Reports

- Prehistoric mining sites
- Island Mine
- Wendigo Mine
- Minong Mine
- Folk and commercial fishery properties
- Edisen Fishery
- Isle Royale Lighthouse (combined HSR/CLR)
- Rock Harbor Lighthouse (combined HSR/CLR)
- Passage Island Lighthouse

Historic Structures Reports

- Rock Harbor Guest House
- Johns Hotel on Barnum Island
- Washington Island Fishery (combined HSR/CLR)
- Rock of Ages Lighthouse
- Isle Royale Lighthouse (combined HSR/CLR)
- Rock Harbor Lighthouse (combined HSR/CLR)
- Passage Island Lighthouse (combined HSR/CLR)

Archeological Survey and Research Needs

- Precontact settings within island interior, along relic shorelines, and in areas where private use agreements have precluded adequate study
- Ransom Smelter Site at Daisy Farm

Ethnographic Research Topics

- Ethnographic resources and sites and traditional ecological knowledge studies
- Ojibwe culture and importance of fishing and fish found at Isle Royale to Ojibwe lifeways
- Information necessary for success of Scandinavian fisherfolk including traditional water routes, lake currents, lake bottom conditions, spawning grounds, fish behavior, and morphotypes of lake trout such as the Rock of Ages trout
- Scandinavian folk fishery tradition including sites of important social gatherings for the fisherfolk, such as Grace Island, Washington Island, and Caribou Island, as pre-park symbols of fishing culture on the island
- Ethnographic overview and assessment of the recreational cabin families

Histories

- Environmental history of mining on Isle Royale
- Administrative history of park including consideration of all cultural resource types

Additional Research Topics Related to Historic Themes

- Information gaps in Isle Royale's archeological record; archeological sites representing remnant mining resources in wilderness
- Historic mining districts and regional context of copper mining and associated impacts on the island landscape
- Dock systems
- Precise locations of cemeteries and burial sites island-wide
- Historic trapping, logging, roads and trails, and other historic activities that are not well defined
- The transition from native subsistence to commercial fishing at Isle Royale
- Connections between logging and fishing at Long Point Fishery
- Use of John Linklater's canoe/time on Isle Royale and Milford Johnson's intermittent use of birch-bark canoe
- Vernacular boats associated with Isle Royale fisheries
- *Skipper Sam* (construction and detailed measurements)
- Significance of park's light station landscapes within the context of the Great Lakes navigational system

APPENDIX C: HISTORIC TREATMENT

DEFINITIONS

The National Park Service is responsible for identifying and planning for the protection of cultural resources significant at the local, state, and national levels, whether or not they relate to the specific authorizing legislation or interpretive programs of the parks in which they are found. Even if natural or recreational resources are the primary reason for a park's establishment, cultural resources must be identified, evaluated, understood in their cultural contexts, and managed in light of their values.

Among other things, effective cultural resource management serves to (1) integrate cultural resource concerns into other park planning and management processes; (2) avoid or minimize adverse effects on cultural resources; (3) provide information for interpretation and public understanding; and (4) identify the most appropriate uses for cultural resources and determine their ultimate treatment (preservation, rehabilitation, restoration, etc.), through processes that include involvement by groups with cultural or religious ties to park resources.

NPS *Management Policies 2006* directs that preservation of cultural resources in their existing states will always receive first consideration (NPS 2006). Treatments entailing greater intervention will not proceed without the consideration of interpretive alternatives. The National Park Service will holistically approach the treatment of related cultural resources in a park. All cultural resource and natural resource values will be considered in defining specific treatment and management goals. The relative importance and relationship of all values will be weighted to identify potential conflicts between and among resource preservation goals, park management and operation goals, and park user goals.

The following preservation treatments are recommended in this CRMP/EA and defined below: preservation, rehabilitation, and restoration. The concept of "adaptive reuse" as a component of a rehabilitation is also defined.

Preservation. The act or process of applying the measures necessary to sustain the existing form, integrity, and materials of a historic property. Work, including preliminary measures to protect and stabilize the property, generally focuses on ongoing maintenance and repair of historic materials and features rather than extensive replacement and new construction. New exterior additions are not within the scope of this treatment; however, the limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a preservation project. For archeological resources, preservation would maintain the existing form, integrity, and materials of the resource. It would include techniques of arresting or retarding deterioration through a program of ongoing maintenance. Deteriorated areas (e.g., depressions created through erosion, slumping, subsidence, and other natural causes) would be backfilled or otherwise stabilized. Regarding historic and prehistoric structures, NPS *Management Policies 2006* directs that a structure or cultural landscape would be preserved in its present condition if that condition allows for satisfactory protection, maintenance, use, and interpretation; or another treatment is warranted but cannot be accomplished until some future time.

For museum objects, NPS *Management Policies 2006* directs that an item in a museum collection would be preserved in its present condition through ongoing preventive care if: (1) that condition is satisfactory for exhibit or research; or (2) another treatment is warranted but it cannot be accomplished

until some future time. An item would be stabilized if: (1) preventive measures are insufficient to reduce deterioration to a tolerable level; or (2) the item is so fragile that it would be endangered under any circumstances. Active conservation treatment (intervention) would be minimized to reduce the possibility of compromising the item's integrity. All active treatment would be documented.

Rehabilitation. The act or process of making possible a compatible use for a property through repair, alterations, and additions, while preserving those parts or features that convey its historical, cultural, or architectural values. Rehabilitation enables “**adaptive reuse**,” allowing an historic property to serve a modern purpose, needed or desired, further elevating the functional importance of the property beyond its historic value. Adaptive reuse is key to historic preservation because it restores active functionality to historic properties while retaining their historic significance. Rehabilitation does not apply to prehistoric structures, ruins, monuments, or outdoor sculpture, nor should it be the ultimate treatment for historically furnished historic structures, even though they may require major modifications to perform as such. Rehabilitation improves the utility or function of a cultural landscape, through repair or alteration, to make possible an efficient compatible use, while preserving those parts or features that are important in defining its significance. Regarding historic and prehistoric structures, *NPS Management Policies 2006* directs that a historic structure or cultural landscape may be rehabilitated for contemporary use if it cannot adequately serve an appropriate use in its present condition and if rehabilitation would retain its essential features and would not alter its integrity and character or conflict with approved park management objectives.

Restoration. The act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a restoration project. *NPS Management Policies 2006* permits restoration only if: (1) it is essential for public understanding of the cultural associations of a park, (2) it can be accomplished with minimal conjecture based on sufficient data, or (3) the disturbance or loss of significant archeological resources is minimized and mitigated by data recovery. Restoration accurately depicts the form, features, and character of a cultural landscape as it appeared at a specific period or as intended by its original constructed design. It may involve the reconstruction of missing historic features and selective removal of later features, some of which may themselves have cultural value. Regarding historic and prehistoric structures, *NPS Management Policies 2006* directs that a structure or cultural landscape may be restored to an earlier appearance if all changes after the proposed restoration period have been professionally evaluated and the significance of those changes has been fully considered; restoration is essential to public understanding of the park's cultural associations; sufficient data about that structure's earlier appearance exist to enable its accurate restoration; and the disturbance or loss of significant archeological resources is minimized and mitigated by data recovery.

For museum objects, *NPS Management Policies 2006* directs that an item in a museum collection may be restored to an earlier appearance if: (1) restoration is required for exhibit or research purposes; (2) sufficient data about that item's earlier appearance exist to enable its accurate restoration; and (3) restoration would not modify that item's known original character. Restoration would be accomplished using the techniques and materials that least modify the item and so that the materials can be removed at a later time with minimal adverse effect. Restored areas would be documented and distinguishable from original material. Restoration would take into account the possible importance of preserving signs of wear, damage, former maintenance, and other historical and scientific evidence.

APPENDIX D: RELATIONSHIP BETWEEN OTHER PLANNING EFFORTS AND THE CULTURAL RESOURCES MANAGEMENT PLAN / ENVIRONMENTAL ASSESSMENT

Several plans for areas within or near the park could influence or be influenced by actions presented in this CRMP/EA. These relevant plans and studies are described below.

General Management Plan. This CRMP/EA supplements the 1998 Isle Royale National Park Final General Management Plan / Environmental Impact Statement (GMP/EIS), which provides broad guidance for the future use and management of cultural resources. The GMP/EIS defines the primary goal of cultural resources management as understanding, preserving, and interpreting the history of human experience on the island. The GMP/EIS also calls for additional inventory, research, and documentation of resources; outlines criteria for making management, preservation, and adaptive use decisions for historic structures; and identifies partnerships as an acceptable avenue to preservation. This CRMP/EA is consistent with the general guidance of the GMP/EIS and helps the park better meet GMP statutory requirements, specifically the requirement to provide “measures for the preservation of the area's resources” (54 USC 100502)..

Draft Wilderness and Backcountry Management Plan / Wilderness Stewardship Plan. The final draft of the Wilderness and Backcountry Management Plan / Environmental Impact Statement (WBMP) was completed in 2011. As it was being reviewed and finalized, key events necessitated the need to develop a supplemental environmental impact statement for Isle Royale’s WBMP. First, during initial development of the CRMP, the planning team quickly identified many planning issues associated with managing cultural resources in wilderness, including the potential for controversy over use of historic structures in wilderness and potential wilderness additions; the high probability for adverse effects on cultural resources in wilderness; and a lack of clear agency policy and guidance for management and potential use of historic wilderness resources. Second, the National Park Service completed new policy guidance regarding wilderness management, Director’s Order 41: Wilderness Stewardship. Given these developments, park staff, with assistance from regional and Washington office staff from all necessary disciplines and management levels, discussed the issues and determined that a supplemental environmental impact statement and a revision of the WBMP according to new policy for completing wilderness stewardship plans was needed. The WSP/SEIS process is underway and is expected to be completed in coordination with this CRMP/EA.

During the initial scoping and alternatives development for the CRMP, this plan was expected to be an EIS, with recommendations for the retention, specific treatments, and proposed public or administrative uses of historic structures in proposed and designated wilderness specified. These recommendations would have then been fully analyzed in the WSP/SEIS and the final decision documented in the record of decision for the WSP/SEIS. However, during development of the two plans, the National Park Service determined that treatment plans and evaluation of alternatives for the retention or removal of historic structures in proposed and designated wilderness will be conducted exclusively in the WSP/SEIS. The benefit of this approach is that all information about historic structures in proposed and designated wilderness can be found in one document. Presenting

this information in one document significantly reduces the number of pages needed for review of the issue and reduces redundancy. Nevertheless, the cultural CRMP/EA and the WSP/SEIS remain interconnected documents that once completed will provide a holistic view of the management of cultural resources parkwide.

Draft Washington and Barnum Islands Cultural Landscape Report. This combined Cultural Landscape Report and Environmental Assessment (CLR/EA) for Washington and Barnum Islands provides guidance for treatment and use of the above-ground resources associated with the significant historic landscapes on the two islands. A decision document was never signed for the decisions from the CLR/EA because of the initiation of the CRMP. Therefore, the actions proposed as part of the CLR/EA are incorporated as part of the action alternatives within this plan. The environmental consequences associated with actions at Washington and Barnum Islands are analyzed in chapter 3. Therefore, the decision document for this plan will institutionalize cultural resource management actions at Washington and Barnum Islands.

Comprehensive Interpretive Plan. Comprehensive interpretive plans address a long-term vision for interpretation in parks and identify short-term actions needed to achieve that vision. A comprehensive interpretive plan includes a long-range interpretive plan, annual implementation plans, and an interpretive database. Isle Royale currently has only a long-range interpretive plan that was completed in 2000 shortly after the GMP/EIS (NPS 2000). That plan developed visitor experience goals consistent with the GMP and recommended actions to be taken in 8 to 10 years to meet those goals. Following completion of the CRMP/EA, a comprehensive interpretive plan, including an updated long-range interpretive plan, needs to be developed to both incorporate new interpretation, education, and visitor experience and opportunity goals outlined in the CRMP, as well as to further identify interpretive goals, visitor experiences, and educational opportunities that are not explicitly identified in this plan.

Draft Windigo Comprehensive Development Concept Plan. A comprehensive plan for enhancements of the Windigo Developed Area was completed in October 2018. The plan conceptualizes improvements to the Windigo area involving new construction and modifying existing facilities. The objectives of the plan are to improve visitor experience through enhanced interpretation and smart and accessible development. Components of the Windigo DCP are necessary for the successful implementation of some of the actions proposed in the CRMP, including the construction of a pavilion for display and interpretation of an historic Wendigo Company wagon.

APPENDIX E: ISLE ROYALE PARTNERSHIP GUIDELINES

Background

The January 2016 Foundation Document for Isle Royale clarified categories of fundamental resources and values related to the purpose of the Park. Fundamental categories include archeological and ethnographic resources illustrating the interaction of human culture and nature, maritime character, and wilderness. Historic properties linked to fundamental categories include historic structures in wilderness and nonwilderness associated with fisheries and lighthouses. The vast majority of buildings and structures on the island (both inside and outside of designated and potential wilderness areas) have been evaluated for eligibility to the National Register of Historic Places (National Register). Those that have not been evaluated but are over 50 years of age are considered National Register-eligible for the purposes of planning efforts at the park. Treatment proposals for these structures in nonwilderness settings are presented in the Cultural Resources Management Plan EA (CRMP). Those in wilderness and potential wilderness will be presented in the Wilderness Stewardship Plan SEIS (WSP). The park will be seeking official partnerships in order to carry out treatments presented in the CRMP.

RESEARCH NEEDS

In addition to treatment proposals for nonwilderness historic properties, the CRMP also calls for increased ethnographic studies. These studies enlighten ongoing traditional use of park resources and examine the association of those uses to historic activities on park lands and associated historic properties and structures.

- The NPS intends to prepare an Ethnographic Overview and Assessment as a first step to defining and evaluating tribal and non-tribal groups who are traditionally associated with Isle Royale. A Tribal Ethnographic Study would follow as a top priority.
 - » As a part of this effort, the Keeper of the National Register of Historic Places listed the Minong Traditional Cultural Property in January 2019 at the national level of significance. The TCP, associated with the Grand Portage Band of Lake Superior Chippewa, covers the entire archipelago, all of Siskiwit Bay, and extends out one quarter mile from all peripheral islands.
- Additional studies, including an Ethnographic Study on Families and Seasonal Camps on Isle Royale would also be completed. The agency expects to hire a university or independent scholar to conduct these studies. The Ethnographic Study on Families and Seasonal Camps on Isle Royale would provide a more thorough analysis of the families' potential as ethnographic resources. In the event that the new study results in a TAP determination for the families and descendants of the Isle Royale seasonal camp residents, enhanced and directed consultation would occur with these traditionally associated people and groups whenever the NPS considers actions that could affect their traditionally associated properties or activities. TAP status does not extend any rights of occupancy within properties owned or administered by the NPS.

DOCUMENTATION NEEDS

In addition to ethnographic studies, several documentation needs exist at the park.

- The NPS is preparing National Register documentation for Tobin Harbor and the evaluation indicates that the historic district is significant at the national level. Because Tobin Harbor is in a wilderness area, treatment proposals for these structures will be presented in the WSP.
- The NPS has prepared a National Historic Landmark (NHL) nomination for the Minong Copper Mining District which includes pre and post European settlement mining activities. This nomination has been through internal and external reviews that include the SHPO and is awaiting a hearing by the National Landmarks Committee of the National Park System Advisory Board.
- The CRMP recommends the preparation of a NHL Multiple Property Documentation for Historic Fisheries. This analysis shall include Fisherman's Home Historic District as well as other fishery resources at Washington Island, the Edisen Fishery, the Anderson-Johnson Fishery, the Hay Bay Fisheries, resources at Long Point, and others. The fisheries are among the fundamental maritime character resources located in the Park.

Partnership Guidelines/Proposals

In order to successfully carry out the preservation treatments, studies, and documentation needs proposed in the CRMP, as well as those to ultimately be presented in the WSP, the park is dependent on the creation of new public/private partnerships. These partnerships, once created, are expected to assist the park with preservation work, with the interpretation of historic resources, and fundraising for preservation activities.

Partnerships may be created with existing non-profit organizations, new non-profit organizations, and government or tribal entities. The park is unlikely to enter into agreements and partnerships with individuals or with individual families, as has been the past model for volunteer agreements following the expiration of life leases and special use permits for occupancy in historic structures. The NPS recognizes the commitment of individuals and descendent families with associations to specific structures and historic camps, and fully expects to continue relationships with these individuals as members of partner organizations. Exclusive occupancy or leasing of historic properties is unlikely to be a component of any future partnerships at Isle Royale. The park desires to increase access to historic resources by the general public; partnerships will support those efforts.

Historic preservation projects to be completed under partnerships shall be prioritized for execution by the park, in consultation with established partner organizations and the SHPO. Preservation projects will support the uses and treatment proposals identified in the selected alternatives of the CRMP (in nonwilderness) and by the WSP (in areas of wilderness and potential wilderness).

In order to aid in the creation of partner organizations and in the creation of effective partnership agreements, the NPS will offer partnership training opportunities in an effort to help interested parties understand the park's preservation needs, to listen to groups who are interested in different areas, and to support coordination between different potential partners. The NPS will also share other opportunities for partnership training available elsewhere in the country.

Tribal Partnerships — The NPS will work with American Indian Tribes to develop partnerships that enhance or revive their long relationship with Isle Royale. Opportunities exist for the development of cultural educational opportunities, improved public interpretation, and for enhanced understanding and identification of the park’s historic and ethnographic properties. The park desires to better identify such properties, locations, and activities and to ensure their protection during future projects.

Non-Tribal Partnerships — The NPS will enter into historic preservation partnerships based on the NPS mission to preserve cultural and natural resources for public benefit and enjoyment. These partnerships will be created to aid the NPS in carrying out the historic property treatments identified in the CRMP and eventually within the WSP. The WSP will define preservation priorities in wilderness and potential wilderness and the CRMP defines preservation priorities in nonwilderness. All partnerships developed with the NPS with respect to historic properties in the Park will address these priorities in a manner consistent with law and NPS policy.

The NPS will seek to enter into General Agreements, Philanthropic Partnership Agreements, or Cooperative Agreements with preservation partners depending on the nature of the activities to be undertaken in the partnerships. Agreements could be made between the NPS and other federal agencies, state agencies, municipal agencies, non-profit organizations, for-profit organizations, corporations or individuals; but the NPS shall primarily seek to work with organized groups, most likely non-profits, with demonstrated capabilities to extend preservation efforts to multiple properties. The NPS does not intend to enter into structure-specific preservation partnerships except in rare situations or in the case of high-cost efforts such as lighthouse preservation. See below for an example template for an NPS General Agreement (note that other agreement formats could be considered – particularly when associated with fundraising efforts).

Members of former life lessee families are viewed as an asset by the NPS in the maintenance of historic buildings and structures, due to their historic connection and experience in caring for the buildings and structures before, during, and after past lease agreements. Partnerships with organizations that include former life lessee family members and descendants are expected.

Example Agreement Language

NOTE — The following template is one type of agreement available to preservation partners. There are other possibilities, particularly for partnerships that involve regular fundraising.

GENERAL AGREEMENT
Between the
NATION AL PARK SERVICE
Isle Royale National Park
And the
[NAME OF PARTNER OR PARTNERS]

This General Agreement (Agreement) is entered into between the National Park Service (NPS), a bureau of the United States Department of the Interior (Department), and the [Name of partner or partners] to [list goals of the partnership] to benefit Isle Royale National Park.

[It is recommended to use “Partner” as the acronym for the partner organization or “Partners” as the acronym for a group of partner organizations.]

ARTICLE I. BACKGROUND AND OBJECTIVES

[Include information about the park or NPS program and all of the partners and information about the partnership that the parties will undertake. Include a paragraph description of the park or NPS program and each partner including descriptions of their purpose and location. It is also best include information about how the partnership came to be, the objectives of the partnership, and other relevant background information that might prove useful to staff not involved in the preparation of this agreement as they assist in the partnership.]

ARTICLE II. AUTHORITY

The NPS enters into this Agreement pursuant to the following legal authorities:

[Include a list of authorities that allow the NPS to participate in this partnership.]

ARTICLE III. RESPONSIBILITIES AND UNDERSTANDINGS OF THE PARTIES

A. The parties jointly agree to:

[Develop a list of responsibilities/activities that both parties will undertake together for this partnership.]

B. The NPS agrees to:

[Develop a list of responsibilities/activities that the NPS will undertake for this partnership. NPS responsibilities may include but are not limited to: staff dedicated to the partnership/project, the use of NPS property and assets, communication, timeliness in going through NPS processes (i.e., permitting, compliance).]

C. [List each partner] agrees to:

[Develop a list of responsibilities/activities that each partner will undertake for this partnership. Develop a new section for each partner. Partner responsibilities may include: staff dedicated to the partnership/project, use of Partner property and assets, commit to abide by NPS policy and procedure, declaration of intent to fundraise or enter into any parallel agreements with the Park/Program Area.]

ARTICLE IV. TERM OF AGREEMENT

Unless earlier terminated by operation of the terms of this Agreement, or by agreement of the parties in writing, this Agreement will be in effect for a period of five (5) years beginning on the date the last signature is affixed to this Agreement.

[This term should not exceed five years, even if the partnership will continue beyond five years. This allows you to work with the partner or partner to update the agreement periodically.]

ARTICLE V. MODIFICATION AND TERMINATION

- A.** This Agreement may be modified by a written instrument signed and executed by the parties.
- B.** Either party may terminate this Agreement for any reason by providing thirty (30) days written notice setting forth the reasons for proposing termination. Neither party will be liable to the other for any costs or claims in the event of termination.

ARTICLE VI. KEY OFFICIALS

The personnel specified below are considered essential to the successful coordination and communication between the Partner[s] and Isle Royale National Park for the work to be performed pursuant to this Agreement. Upon written notice to all the other parties, that party may designate an alternate to act in place of the designated Key Official or designate a new Key Official.

For Isle Royale National Park:

[For each Key Official, list their name, title, organization, address, telephone number, cellphone number and email address.]

For [list each partner]:

[For each Key Official, list their name, title, organization, address, telephone number, cellphone number and email address.]

ARTICLE VII. STANDARD CLAUSES

- A. Non-Discrimination:** All activities pursuant this agreement and the provisions of Executive Order 1 1246; shall be in compliance with requirements of Title VI of the Civil Rights Act of 1 964 (78 Stat. 252 42 U.S.C. § 2000d et se~q.); Title V, Section 504 of the Rehabilitation Act of 1973 (87 Stat. 394; 29 U.S. C. §794); the Age Discrimination Act of 1975 (89 Stat. 728; 42 U.S.C. § §6101 et seq.); and with all other Federal laws and regulations prohibiting discrimination on grounds of race, color, national origin, handicap, religious or sex in providing of facilities and service to the public.
- B. NPS Appropriations:** Pursuant to 31 U.S.C. § 1341, nothing contained in this Agreement shall be construed to obligate NPS, the Department, or the United States of America to any current or future expenditure of funds in advance of the availability of appropriations from Congress and their administrative allocation for the purposes of this Agreement, nor does this Agreement obligate NPS, the Department, or the United States of America to spend funds on any particular project or purpose, even if funds are available.
- C. Prior Approval:** The [Partner or Partners] shall obtain prior written approval from the NPS before:
1. Holding special events within the Park [if the partnership is with a park];
 2. Entering into third-party agreements of a material nature;
 3. Assigning or transferring this Agreement or any part thereof;
 4. Constructing any structure or making any improvements within the Park's boundaries;
 5. Releasing any public information that refers to the Department, the NPS, Isle Royale National Park, any NPS employee (by name or title), this Agreement or the projects contemplated hereunder.
- D. Compliance with Applicable Laws:** This Agreement and performance hereunder is subject to all law, regulations and management policies including those governing the NPS property and resources, whether now in force or hereafter enacted or promulgated. Nothing in this Agreement shall be construed as in any way impairing the general powers of the NPS for supervision, regulation, and control of its property under such applicable laws, regulations, and management policies. Nothing in this Agreement shall be deemed inconsistent with or contrary to the purpose of or intent of any Act of Congress.

- E. Disclaimers of Government Endorsement:** The [Partner or Partners] will not publicize or circulate materials (such as advertisements, solicitations, brochures, press releases, speeches, pictures, movies, articles, manuscripts, or other publications), suggesting expressly or implicitly, that the Government, the Department, NPS, or Government employees endorse the [Partner's or Partners'] business, goods, or services. All materials referring to the Government must be approved by the NPS Key Official prior to publication. Nothing herein is intended to prevent the NPS or the Department of the Interior from recognizing the partnership or contributions made by the Partners to NPS, and from authorizing an inclusion of such recognition in materials generated by the [Partner or Partners] related to this Agreement.
- F. Modifications:** This Agreement may be extended, renewed, supplemented or amended only when agreed to in writing by the NPS and the [Partner or Partners].
- G. Waiver:** No waiver of any provisions of this Agreement shall be effective unless made in writing and signed by the waiving party. No waiver of any provision of this Agreement shall constitute a waiver of any prior, concurrent or subsequent breach of the same or any other provisions hereof.
- H. No Agency:** The [Partner or Partners] are not agents or representatives of the United States, the Department of the Interior, or the NPS, nor will the [Partner or Partners] represent themselves as such to third parties. The NPS is not an agent or representative of the [Partner or Partners], nor will the NPS represent itself as such to third parties. Nothing in this Agreement shall at any time be construed so as to create the relationship of employer and employee, principal and agent, or joint venture as between [Partner or Partners] and the NPS.
- I. Officials Not to Benefit:** No Member of, Delegate to, Resident Commissioner in, Congress shall be admitted to any share or part of this Agreement or to any benefit to arise therefrom, unless the share or part benefit is for the general benefit of a corporation or company.
- J. Liability:** The Parties accept responsibility for any property damage, injury or death, caused by the acts or omissions of their respective employees, acting within the scope of their employment, to the fullest extent permitted by law.
- K. Non-Exclusive Agreement:** This Agreement in no way restricts either the NPS or the [Partner or Partners] from entering into similar agreements, or participating in similar activities or arrangements, with other public or private agencies, organizations, or individuals.
- L. Partial Invalidity:** If any provision of this Agreement or the application thereof to any party or circumstance shall, to any extent, be held invalid or unenforceable, the remainder of this Agreement or the application of such provision to the parties or circumstances other than those to which it is held invalid or unenforceable, shall not be affected thereby and each provision of this Agreement shall be valid and be enforced to the fullest extent permitted by law.

ARTICLE VIII. SIGNATURES

IN WITNESS WHEREOF, the parties hereto have executed this Agreement on the dates set forth below.

[The GA goes into effect as soon as the designated NPS official signs the agreement, even if that occurs before the partner(s) has signed. For this reason, NPS staff are advised to ensure that the partner organization(s) signs before the NPS does.]

FOR THE [Name of partner organization]:

[Name of signatory for partner organization]
[Title of signatory]
[Name of partner organization]

Date

FOR Isle Royale National Park:

[Name of signatory for NPS]
[Title of signatory]
Isle Royale National Park

Date

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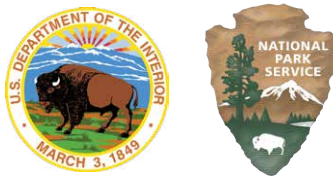
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As the nation’s principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historic places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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