



**APPENDIXES,  
SELECTED REFERENCES,  
PREPARERS,  
INDEX**



## APPENDIX A: LEGISLATION

Public Law 91-424  
September 26, 1970

### An Act

To provide for the establishment of the Apostle Islands National Lakeshore in the State of Wisconsin, and for other purposes.

*Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,* That in order to conserve and develop for the benefit, inspiration, education, recreational use, and enjoyment of the public certain significant islands and shoreline of the United States and their related geographic, scenic, and scientific values, there is hereby established the Apostle Islands National Lakeshore (hereinafter referred to as the "lakeshore") in Ashland and Bayfield Counties, Wisconsin, consisting of the area generally depicted on the map entitled "Apostle Islands National Lakeshore", numbered NL-AI-91,000, sheets 1 and 2, and dated June 1970. The map shall be on file and available for public inspection in the office of the Director, National Park Service, Department of the Interior.

**Sec. 2.** No lands held in trust by the United States for either the Red Cliff Band or Bad River Band of the Lake Superior Chippewa Indians, or for allottees thereof, shall be acquired or included within the boundaries of the lakeshore established by this Act, with the following exception:

If the Indians who own more than 50 per centum of the interest in allotment number 74 GL or allotment number 135 in the Red Cliff Reservation agree to sell the allotment to the Secretary of the Interior (hereinafter referred to as the "Secretary"), the Secretary may consent to the sale on behalf of the other owners, purchase the allotment for the negotiated price and revise the boundaries of the lakeshore to include the allotment.

**Sec. 3.** The Secretary may acquire within the boundaries of the lakeshore lands and interests therein by donation, purchase with donated or appropriated funds, or exchange, but lands and interests in lands owned by the State of Wisconsin may be acquired only by donation. Notwithstanding any other provision of law, any Federal property located within the boundaries of the lakeshore may, with the concurrence of the agency having custody thereof, be transferred without transfer of funds to the administrative jurisdiction of the Secretary for the purposes of the lakeshore.

**Sec. 4. (a)** With the exception of not more than eighty acres of land to be designated within the lakeshore boundaries by the Secretary as an administrative site, visitor center, and related facilities, as soon as practicable, any owner or owners of improved property on the date of its acquisition by the Secretary may, as a condition of such acquisition, retain for themselves and their successors or assigns a right of use and occupancy of the improved property for noncommercial residential purposes for a definite term not to exceed twenty-five years, or, in lieu thereof, for a term ending at the death of the owner, or the death of his spouse, whichever is the later. The owner shall elect the term to be reserved. The Secretary shall pay to the owner the fair market value of the property on the date of such acquisition less the fair market value on such date of the right retained by the owner.

(b) A right of use and occupancy retained pursuant to this section may be terminated with respect to the entire property by the Secretary upon his determination that the property or any portion thereof has ceased to be used for noncommercial residential or for agricultural purposes, and upon tender to the holder of a right an amount equal to the fair market value, as of the date of the tender, of that portion of the right which remains unexpired on the date of termination.

(c) The term "improved property", as used in this section, shall mean a detached, noncommercial residential dwelling, the construction of which was begun before January 1, 1967 (hereinafter referred to as "dwelling"), together with so much of the land on which the dwelling is situated, the said land being in the same ownership as the dwelling, as the Secretary shall designate to be reasonably necessary for the enjoyment of the dwelling for the sole purpose of noncommercial residential use, together with any structures accessory to the dwelling which are situated on the land so designated.

**Sec. 5.** The Secretary shall permit hunting, fishing, and trapping on lands and waters under his jurisdiction within the boundaries of the lakeshore in accordance with the appropriate laws of Wisconsin and the United States to the extent applicable, except that he may designate zones where, and establish periods when, no hunting, trapping, or fishing shall be permitted for reasons of public safety, administration, fish or wildlife management, or public use and enjoyment. Except in emergencies, any regulations prescribing any such restrictions shall be put into effect only after consultation with the appropriate State agency responsible for hunting, trapping, and fishing activities.

**Sec. 6.** The lakeshore shall be administered, protected, and developed in accordance with the provisions of the Act of August 25, 1916 (39 Stat. 535; 16 U.S.C. 1, 2-4), as amended and supplemented; and the Act of April 9, 1924 (43 Stat. 90; 16 U.S.C 8a et seq), as amended, except that any other statutory authority available to the Secretary for the conservation and management of natural resources may be utilized to the extent he finds such authority will further the purposes of the Act.

**Sec. 7.** In the administration, protection, and development of the lakeshore, the Secretary shall adopt and implement, and may from time to time revise, a land and water use management plan which shall include specific provision for--

(a) protection of scenic, scientific, historic, geological, and archeological features contributing to public education, inspiration, and enjoyment;

(b) development of facilities to provide the benefits of public recreation together with such access roads as he deems appropriate; and

(c) preservation of the unique flora and fauna and the physiographic and geologic conditions now prevailing on the Apostle Islands within the lakeshore: *Provided*, That the Secretary may provide for the public enjoyment and understanding of the unique natural, historical, scientific, and archeological features of the Apostle Islands through the establishment of such trails, observation points, exhibits, and services as he may deem desirable.

**Sec. 8.** There are authorized to be appropriated not more than \$4,250,000 for the acquisition of lands and interests in lands and not more than \$5,000,000 for the development of the Apostle Islands National Lakeshore.

**Approved September 26, 1970**

Public Law 99-497  
October 17, 1986

## An Act

To authorize the inclusion of certain additional lands with the Apostle Island National Lakeshore.

*Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,*

The Act of September 26, 1970 (Public Law 91-424: 16 U.S.C. 460w) is amended as follows:

(1) In section 1 –

- (a) In the first sentence, after the phrase “consisting of”, insert: “(a) IN GENERAL—”
- (b) at the end of the first sentence, delete “1970” and insert: “1970; and (b) LONG ISLAND ADDITION.—Approximately 200 acres of land at the mouth of Chequamegon Bay known as “Long Island”, as depicted on the map numbered NL-AI-91,001 and dated December, 1985”;
- (c) in the last sentence, delete “map” and insert “maps”.

(2) In section 3, after the word “donation”, strike the following sentence and insert in lieu thereof the following: “Notwithstanding any provision of law, any Federal property located within the boundaries of the lakeshore is hereby transferred without transfer of funds to the administrative jurisdiction of the Secretary for the purposes of the lakeshore: *Provided*, That the United States Coast Guard may retain a right to utilized a portion of such land and facilities for use as navigational aids so long as may be required”.

(3) In section 4(c), after “January 1, 1967”, insert: “, or before January 1, 1985 for those lands referred to in section 1(b).”.

(4) Section 8 of such Act is amended by adding the following at the end thereof: “Effective October 1, 1986, there are authorized to be appropriated such additional sums as may be necessary for the acquisition of the lands described in section 1(b).”.

## WILDERNESS LEGISLATION

### Public Law 108-447, December 8, 2004

Section 140. Gaylord A. Nelson Apostle Islands National Lakeshore Wilderness Act.

(b) DEFINITIONS.—In this section:

- (1) MAP.—The term “map” means the map entitled “Apostle Islands Lakeshore Wilderness”, numbered 633/80,058 and dated September 17, 2004.
- (2) SECRETARY.—The term “Secretary” means the Secretary of the Interior.
- (3) HIGH-WATER MARK.—The term “high-water mark” means the point on the bank or shore up to which the water, by its presence and action or flow, leaves a distinct mark indicated by erosion, destruction of or change in vegetation or other easily recognizable characteristic.

(c) DESIGNATION OF APOSTLE ISLANDS NATIONAL LAKESHORE WILDERNESS.—

(1) DESIGNATION.—Certain lands comprising approximately 33,500 acres within the Apostle Islands National Lakeshore, as generally depicted on the map referred to in subsection (b), are hereby designated as wilderness in accordance with section 3(c) of the Wilderness Act (16 U.S.C. 1132), and therefore as components of the National Wilderness Preservation System.

(2) MAP AND DESCRIPTION.—

- (A) The map referred to in subsection (b) shall be on file and available for public inspection in the appropriate offices of the National Park Service.
- (B) As soon as practical after enactment of this section, the Secretary shall submit a description of the boundary of the wilderness areas to the Committee on Energy and Natural Resources of the Senate and the Committee on Resources of the United States House of Representatives.
- (C) The map and description shall have the same force and effect as if included in this section, except that the Secretary may correct clerical and typographical errors in the description and maps.

(3) BOUNDARY OF THE WILDERNESS.—Any portion of wilderness designated in paragraph (c)(1) that is bordered by Lake Superior shall use as its boundary the high-water mark.

(4) NAMING.—The wilderness area designated by this section shall be known as the Gaylord A. Nelson National Wilderness.

(d) ADMINISTRATION.—

(1) MANAGEMENT.—Subject to valid existing rights, the lands designated as wilderness by this section shall be administered by the Secretary in accordance with the applicable provisions of the Wilderness Act (16 U.S.C. 1131), except that—

- (A) any reference in that Act to the effective date shall be considered to be a reference to the date of enactment of this section; and
- (B) where appropriate, any reference to the Secretary of Agriculture shall be considered to be a reference to the Secretary of the Interior with respect to lands administered by the Secretary.

(2) SAVINGS PROVISIONS.—Nothing in this section shall—

- (A) modify, alter, or in any way affect any treaty rights;
- (B) alter the management of the waters of Lake Superior within the boundary of the Apostle Islands National Lakeshore in existence on the date of enactment of this section; or

(C) be construed to modify, limit, or in any way affect the use of motors on the lake waters, including snowmobiles and the beaching of motorboats adjacent to wilderness areas below the high-water mark, and the maintenance and expansion of any docks existing at the time of the enactment of this section.

**Public Law 109-97, November 11, 2005**

**SEC. 440. REDESIGNATION OF WILDERNESS.**

(a) REDESIGNATION — Section 140(c)(4) of division E of Public Law 108-447 is amended by striking ‘National’.

(b) REFERENCES — Any reference in a law, map, regulation, document, paper, or other record of the United States to the ‘Gaylord A. Nelson National Wilderness’ shall be deemed to be a reference to the ‘Gaylord A. Nelson Wilderness’.

**Public Law 111-11, March 30, 2009**

**SEC. 7116. TECHNICAL CORRECTIONS.**

(a) GAYLORD NELSON WILDERNESS.—

(1) REDESIGNATION.—Section 140 of division E of the Consolidated Appropriations Act, 2005 (16 U.S.C. 1132 note; Public Law 108-447), is amended—

(A) in subsection (a), by striking “Gaylord A. Nelson” and inserting “Gaylord Nelson”; and

(B) in subsection (c)(4), by striking “Gaylord A. Nelson Wilderness” and inserting “Gaylord Nelson Wilderness”.

(2) REFERENCES.—Any reference in a law, map, regulation, document, paper, or other record of the United States to the “Gaylord A. Nelson Wilderness” shall be deemed to be a reference to the “Gaylord Nelson Wilderness”.

## APPENDIX B: MINIMUM REQUIREMENT ANALYSIS

Apostle Islands National Lakeshore

National Park Service  
U.S. Department of the Interior



Superintendent's Order #40

### Wilderness Minimum Requirement Process

Effective Date of this Order:	September 12, 2008
Last Revision Date:	N/A
Supersedes:	Numbered memorandum 97-11, and any others or portions of others on the topic covered within
For More Information, Contact:	Superintendent
Reviewed By:	<div><div><input checked="" type="checkbox"/> Chief, Planning and Resource Management</div><div><input checked="" type="checkbox"/> Chief, Interpretation and Education</div><div><input checked="" type="checkbox"/> Chief, Administration</div><div><input checked="" type="checkbox"/> Chief, Protection</div><div><input checked="" type="checkbox"/> Chief, Facility Management</div></div>
Approved:	<div>Robert J. Krumenaker, Superintendent</div>

#### Purpose

On December 8, 2004, Congress designated approximately 80% of the Apostle Islands National Lakeshore as the Gaylord Nelson Wilderness. With this designation comes a heightened management responsibility for the park's wilderness resources – responsibilities that were always with us by policy, but are now with us by law.

One concept that permeates wilderness management is that of “minimum requirement.” According to *2006 Management Policies 6.3.5*, it is necessary that

*Parks must develop a process to determine minimum requirement until the plan [Wilderness Management Plan] is finally approved.*

The park is currently developing a new General Management Plan/Wilderness Management Plan, but at least until it is completed, we need a “process,” which is what this Superintendent's Order defines.

#### What is Minimum Requirement?

“Minimum requirement,” when used in the context of wilderness, refers to a documented two-step process which:

- 1) Determines if a proposed action is necessary and appropriate for the administration of the area *as wilderness*; and
- 2) Determines how the action will be carried out in a manner that minimizes impacts to wilderness resources, if the action is determined to be necessary in wilderness

## When Will the Minimum Requirement Process be Used?

Whenever a proposed action has the potential to impact wilderness resources, or whenever a proposed action involves otherwise prohibited actions or equipment (as defined by the Wilderness Act) in the Gaylord Nelson Wilderness, the project initiator will be responsible for completing the minimum requirement process.

## Who Determines When Minimum Requirement is Necessary?

Most projects or actions that might have an impact on wilderness resources are already being entered into the NPS Planning, Environment, and Public Comment (PEPC) system. In such cases, the Chief of Planning and Resource Management will determine whether the minimum requirement process will be necessary for any given project, inform the project initiator immediately upon making a positive determination, and ensure the process is properly documented within PEPC. For actions or projects in wilderness that for whatever reason are not in PEPC, employees responsible for those actions or projects are responsible for recognizing when there is a potential for wilderness impacts, and for initiating the minimum requirement process. When in doubt, ask questions or consult the wilderness management chapter in *Management Policies*.

## How does the Minimum Requirement Process Work?

- When it has been determined a minimum requirement analysis must be completed, the project initiator should obtain a copy of the Microsoft Word file “[APIS Minimum Requirement Forms.doc](#)” from the FORMS folder on the Share drive, or wherever the park’s digital forms are available at the time. Instructions are available in another file called “[APIS Minimum Requirement Instructions.doc](#)” found in the same location.
- The form should be filled out electronically and emailed to the Chief of Planning and Resource Management when complete. If STEP 2 and beyond on the form are necessary, be sure to define three alternatives for approaching the problem, answer the questions for each of the alternatives, and complete the scoring table.
- The Chief of Planning and Resource Management will review the form and ask for clarification when necessary. When he or she determines the answers are satisfactory, and the interests of the park’s wilderness resources are the primary driver behind the decision, it will be forwarded to the Superintendent for approval.
- Once approved by the Superintendent, the Chief of Planning and Resource Management will attach the completed form to PEPC for the long-term archival of the decision. This process must be completed prior to the project being approved in PEPC.

<b>MINIMUM REQUIREMENT ANALYSIS WORKSHEET</b> <b>APOSTLE ISLANDS NATIONAL LAKESHORE</b>	
Rev 1/2008	
<b>PROPOSED ACTION:</b> _____	
LEAD PERSON(S): _____ WORK UNIT(S): _____	
<b>STEP 1</b> of Minimum Requirement: Is this action necessary to manage the area?	
<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <b>A</b> IS THIS AN EMERGENCY?           </div> <div style="display: flex; justify-content: space-around; margin-bottom: 10px;"> <span>YES</span> <span>NO</span> </div> <div style="display: flex; justify-content: space-around; margin-bottom: 10px;"> <div style="text-align: center;">             ACT ACCORDING TO APPROVED EMERGENCY MINIMUM TOOL CRITERIA           </div> <div style="text-align: center;">             ACT ACCORDING TO APPROVED EMERGENCY MINIMUM TOOL CRITERIA           </div> </div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <b>B</b> IS THE PROPOSED ACTION ALLOWED IN WILDERNESS BY LEGISLATION, POLICY, OR AN APPROVED MANAGEMENT PLAN?           </div> <div style="display: flex; justify-content: space-around; margin-bottom: 10px;"> <span>YES</span> <span>NO</span> </div> <div style="display: flex; justify-content: space-around; margin-bottom: 10px;"> <div style="text-align: center;">             DO ACCORDING TO APPROVED CRITERIA           </div> <div style="text-align: center;">             DO ACCORDING TO APPROVED CRITERIA           </div> </div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <b>C</b> CAN THE OBJECTIVES BE ACCOMPLISHED THROUGH AN ACTION OUTSIDE OF WILDERNESS?           </div> <div style="display: flex; justify-content: space-around; margin-bottom: 10px;"> <span>YES</span> <span>NO</span> </div> <div style="display: flex; justify-content: space-around; margin-bottom: 10px;"> <div style="text-align: center;">             DO IT THERE, OR GO TO STEP 2           </div> <div style="text-align: center;">             DO IT THERE, OR GO TO STEP 2           </div> </div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <b>D</b> DOES THIS ACTION CONFLICT WITH LONG-TERM WILDERNESS PLANNING GOALS, OBJECTIVES, OR DESIRED FUTURE RESOURCE CONDITIONS?           </div> <div style="display: flex; justify-content: space-around; margin-bottom: 10px;"> <span>YES</span> <span>NO</span> </div> <div style="display: flex; justify-content: space-around; margin-bottom: 10px;"> <div style="text-align: center;">             DON'T DO IT, OR GO TO STEP 2           </div> <div style="text-align: center;">             DON'T DO IT, OR GO TO STEP 2           </div> </div> <div style="border: 1px solid black; padding: 5px;"> <b>E</b> CAN THE OBJECTIVES BE ACCOMPLISHED THROUGH AN ACTION THAT DOES NOT INVOLVE PROHIBITED USES?           </div> <div style="display: flex; justify-content: space-around; margin-bottom: 10px;"> <span>YES</span> <span>NO</span> </div> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;">             DO IT, OR GO TO STEP 2           </div> <div style="text-align: center;">             GO TO STEP 2           </div> </div>	<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;">             Answer: <input type="checkbox"/> Yes <input type="checkbox"/> No              Explain:           </div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;">             Answer: <input type="checkbox"/> Yes <input type="checkbox"/> No              Explain:           </div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;">             Answer: <input type="checkbox"/> Yes <input type="checkbox"/> No              Explain:           </div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;">             Answer: <input type="checkbox"/> Yes <input type="checkbox"/> No              Explain:           </div> <div style="border: 1px solid black; padding: 5px;">             Answer: <input type="checkbox"/> Yes <input type="checkbox"/> No              Explain:           </div>

STEP 2 of Minimum Requirement: What is the minimum tool (how the action should be done in wilderness)			
<b>A</b>	<p>DESCRIBE, IN DETAIL, ALTERNATIVE WAYS TO ACCOMPLISH THE PROPOSED ACTION *</p> <p>(may include primitive skills/tools, mechanized/ motorized, and/or combination alternatives)</p> <p>ANSWER ALL QUESTIONS ON NEXT PAGE</p> <hr/> <p>(Use addition pages if necessary)</p>		<p>* Minimum questions to consider for each alternative:</p> <p>What is proposed?</p> <p>Where will the action take place? (location)</p> <p>When will the action take place? (dates/use periods)</p> <p>How often will this activity take place (frequency)</p> <p>How long will it take to complete the activity? (duration)</p> <p>What design and standards will apply?</p> <p>What methods and techniques will be used? (tools, etc.)</p> <p>How many people are needed to complete the action?</p> <p>Why is it being proposed in this manner?</p> <p>If there are adverse impacts, how long will they persist?</p> <p>What mitigation will take place to minimize action impacts?</p>
<p>GO TO NEXT STEP</p> <p>↓</p>			
<b>B</b>	<p>EVALUATE WHICH ALTERNATIVE WOULD HAVE THE LEAST OVERALL IMPACT ON WILDERNESS RESOURCES, CHARACTER AND VISITOR EXPERIENCE WHILE ACHIEVING OBJECTIVE</p>		<p>** Minimum criteria used to evaluate each alternative:</p> <p>Biophysical effects (magnitude, duration, frequency)</p> <p>Social/Recreational/Experiential effects</p> <p>Societal/Political effects</p> <p>Health/Safety concerns</p> <p>Economical/Timing considerations</p>
<p>GO TO NEXT STEP</p> <p>↓</p>			
<b>C</b>	<p>SELECT AN APPROPRIATE, PREFERRED ALTERNATIVE</p>	<p>IF REQUIRED →</p>	<b>D</b>
<p>ATTAIN APPROVAL OF YOUR MINIMUM REQUIREMENT REVIEW FROM THE SUPERINTENDENT AND ATTACH TO PEPC</p>			
Describe Alternative 1:			
Describe Alternative 2:			
Describe Alternative 3:			

List preferred alternative and give justification:

Minimal Tool Questions and Answers (answer EACH question for EACH alternative)

Alternative 1. Name of alternative.

1. What is proposed?
2. Where will the action take place (location)?
3. When will the action take place (dates/use periods)?
4. How often will this activity take place (frequency)
5. How long will it take to complete the activity (duration)?
6. What design and standards will apply?
7. What methods and techniques will be used? (tools, etc.):
8. How many people are needed to complete the action?
9. Why is it being proposed in this manner?
10. If there are adverse impacts, how long will they persist?
11. What mitigation will take place to minimize action impacts?

Alternative 2. Name of alternative.

12. What is proposed?
13. Where will the action take place (location)?
14. When will the action take place (dates/use periods)?
15. How often will this activity take place (frequency)
16. How long will it take to complete the activity (duration)?
17. What design and standards will apply?
18. What methods and techniques will be used? (tools, etc.):
19. How many people are needed to complete the action?
20. Why is it being proposed in this manner?
21. If there are adverse impacts, how long will they persist?
22. What mitigation will take place to minimize action impacts?

Alternative 3. Name of alternative.

23. What is proposed?
24. Where will the action take place (location)?
25. When will the action take place (dates/use periods)?
26. How often will this activity take place (frequency)
27. How long will it take to complete the activity (duration)?
28. What design and standards will apply?
29. What methods and techniques will be used? (tools, etc.):
30. How many people are needed to complete the action?
31. Why is it being proposed in this manner?
32. If there are adverse impacts, how long will they persist?
33. What mitigation will take place to minimize action impacts?

**Scoring Table:**

For each issue and each alternative, assign a relative score that measures the level of impact. Carefully consider all angles to the issue, be prepared to defend your answers. Be sure to quantify both beneficial (+) and negative (-) impacts. Beneficial impacts range from 0 to +3 (positive #s), negative impacts score from -4 to 0 (negative #s). Consistency across alternatives is the most critical consideration.

0: No impact -1 or +1: Negligible to minor impact -2 or +2: Minor to moderate impact -3 or +3: Major impact -4: Impairment

Issue	Alternative 1	Alternative 2	Alternative 3
Biophysical effects	Beneficial: + Negative: -	Beneficial: + Negative: -	Beneficial: + Negative: -
Social – Recreational – Experiential effects	Beneficial: + Negative: -	Beneficial: + Negative: -	Beneficial: + Negative: -
Societal – Political effects	Beneficial: + Negative: -	Beneficial: + Negative: -	Beneficial: + Negative: -
Health – Safety concerns	Beneficial: + Negative: -	Beneficial: + Negative: -	Beneficial: + Negative: -
Economical – Timing considerations	Beneficial: + Negative: -	Beneficial: + Negative: -	Beneficial: + Negative: -

**Example:**

Issue	Alternative 1	Alternative 2	Alternative 3
Biophysical effects	Beneficial: +1 Minor help for vegetation but moderate negative impacts to wildlife	Beneficial: +3 Very beneficial for vegetation and wildlife, negligible impacts to water	Beneficial: +2 Minor beneficial impact for vegetation, minor negative impact for wildlife

**REVIEW and APPROVAL**  
**Minimum Requirement Analysis**

Prior to implementation of the proposed action, the following individuals must review and/or approve the Minimum Requirement analysis. Signatures indicate review and/or approval.

**Special Considerations for Project Leader:**

Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_  
James A. Nepstad  
Chief of Planning and Resource Management

Approved by: \_\_\_\_\_ Date: \_\_\_\_\_  
Robert J. Krumenaker  
Superintendent

### Minimum Requirement Analysis Worksheet Instructions

The following are instructions for completing the Minimum Requirement Analysis Worksheet. Answer the questions asked on the worksheet in the spaces provided. Once completed and a decision is made, a copy of the worksheet will be kept on file with other action documents.

Proposed Action: List the proposed action

Lead Person(s): List the person or persons proposing and responsible for the action.

Work Unit(s): List the work unit or units who will be conducting the action.

#### **STEP 1 of Minimum Requirement: Is this action necessary to manage the area?**

*A: Is this an Emergency?*

The definition of an emergency must be consistent with conditions outlined in an approved park plan. If yes, act according to approved emergency minimum tool criteria in the appropriate plan. Note that the above plans should contain a Minimum Requirement Analysis. If no, go to B.

*B: Is the proposed action allowed by legislation, policy, or an approved management plan?*

Determine if the proposed action is mandated by legislation or essential to achieve planned **wilderness** objectives. These objectives must be presented in approved park plans (e.g., Wilderness/ Backcountry Management Plan, Fire Management Plan, General Management Plan, Resource Management Plan, etc.). If yes, complete the action according to approved criteria. If no, or if no criteria have been developed, go to C.

*C: Can the objectives be accomplished through an action outside of the wilderness?*

If yes, conduct action or place facilities determined "essential" (e.g., visitor orientation, information sign, training, radio repeater station, and research) outside wilderness. If no, go to D.

*D: Does this action conflict with long-term wilderness planning goals, objectives or desired future resource conditions?*

Park staff and managers must be familiar with planned wilderness goals, objectives, and future desired conditions. If yes, then do not complete the action. If no, go to E.

*E: Can the objectives be accomplished through an action that does not involve prohibited activities or uses?*

Explore less intrusive actions such as visitor education, staff training, signing, information media, regulations, use limits, law enforcement, area or trail closures, etc. If yes, implement action using the appropriate process. If no, go to Step 2.

#### **STEP 2 of Minimum Requirement: What is the minimum tool?**

*A: Describe, in detail, alternative ways to accomplish the proposed action.*

For the Minimum Requirement concept to work, it is important to develop and seriously consider a range of realistic alternatives to help determine the appropriate minimum tool needed to accomplish the action. This process involves a tiered analysis beginning with the proposed alternative and including at least one less-intrusive alternative using minimally obtrusive, primitive/traditional skills.

Primitive skills involve the proficient use of tools and skills of the pre-motorized or pioneering era (e.g., the double-bit axe, the crosscut saw, and the pack string). A working understanding of primitive skills is important to appropriately plan for their use. Managers must take the lead in demonstrating that tasks can be performed well by primitive or traditional, non-motorized methods. Field staff requires adequate training in primitive-tool selection, use, and care to efficiently accomplish planned work. While agency staff should constantly stress the importance of using primitive skills in accomplishing management objectives, they should also understand a minimum requirement analysis might not always lead to the use of a primitive tool.

The use of motorized equipment is prohibited when other reasonable alternatives are available to protect wilderness values. While Congress mandated a ban on motors and mechanized equipment, it also recognized managers might occasionally need those sorts of tools. While this provision complicates the decision-making process, it remains an exception to be exercised very sparingly and only when it meets the test of being the minimum necessary for wilderness purposes. If some compromise of wilderness resources or character is unavoidable, only those actions that have localized, short-term adverse impacts will be acceptable (NPS Reference Manual 41).

The minimum questions that should be answered for each alternative are:

- What is proposed?
- Where will the action take place? (location)
- When will the action take place? (dates/use periods)
- How often will the action take place? (frequency)
- How long will it take to complete the activity? (duration)
- What design and standards will apply? (compliance?)
- What methods and techniques will be used? (tools and equipment needed)
- How many people are needed to complete the action? (size of field crew)
- Why is it being proposed in this manner?
- If there are adverse impacts, how long will they persist?
- What mitigation will take place to minimize action impacts?

*B: Evaluate which alternative would have the least overall impact on wilderness resources character and visitor experience while achieving the objective.*

The manager must determine how to effectively and safely accomplish the action with the least impact on the wilderness resource and visitor experience. To assist with this determination, managers should use the following five criteria to evaluate each alternative. Discuss the duration, magnitude, and frequency of the effect where applicable. A brief statement about each should suffice. Include both negative and positive effects, as appropriate. If one or more criteria are not applicable, or if the proposed action will have no apparent effect, include a statement that explains this.

1) Biophysical effects:

- Describe the environmental resource issues that may be affected by the action.
- Describe any effects this action will have on preserving natural or cultural resources.

2) Social/Recreation/Experiential effects:

- Describe how the wilderness experience may be affected by the proposed action.
- Consider effects to recreation use and wilderness character, including opportunities for visitor discoveries, surprise, and self-discovery.

3) Societal/Political effects

Describe any political considerations, such as MOUs, agency agreements, and local positions that may be affected by the proposed action.  
Describe relationship of method to applicable laws.

4) Health/Safety concerns

Describe and consider any health and safety concerns associated with the proposed action. Consider types of tools used, training, certifications and other administrative needs to ensure a safe work environment for staff. Also consider the effect each of the proposed alternatives may have on the health and safety of the public.

5) Economic/Timing considerations

Describe the costs and timing associated with implementing each alternative.  
Assess the urgency and potential cumulative effect from this proposal and similar actions.  
The potential disruption of wilderness character and resources and applicable safety concerns will be considered before, and given significantly more weight than, economic efficiency.

*C: Select an appropriate preferred alternative.*

Consult with appropriate park staff and/or the NPS Wilderness Steering Committee as to which of the alternatives will cause the least overall impact to the wilderness resources and character while still accomplishing the objective or purpose. Select this alternative, give the justification as to why the alternative was selected and list who was involved in the decision.

The net result of a minimum requirement analysis is a carefully weighed project or action that is found to be the most effective way of meeting wilderness objectives and the minimum necessary for Wilderness Act purposes.

*D: Attach the appropriate project proposal/clearance form for review and approval/disapproval signature.*

Attach the Minimum Requirement Analysis Worksheet to the appropriate proposal/clearance form prepared under NEPA guidance.

## APPENDIX C: CAMPGROUND DESIGN ANALYSIS AND MANAGEMENT STRATEGIES

Based on discussions with the planning team, park staff, and Dr. Jeff Marion, research biologist with the USGS Patuxent Wildlife Research Center, Virginia Tech Field Station, the following guidance on campsite planning, design, and management was prepared for the Apostle Islands National Lakeshore. The appendix includes objectives for the park's campsite system, campsite management guidelines, and designated camping zone management strategies.

### CAMPSITE SYSTEM OBJECTIVES

- Protect natural and cultural resources
- Provide for a diversity of high-quality camping opportunities, including informal, zone-based, camping
- Provide some opportunities for solitude throughout the park, especially at campsites within the Gaylord Nelson Wilderness
- Provide reasonable access for visitors and staff to the campsite system
- Ensure campsites are safe and maintainable
- Provide effective messages on appropriate use of campsites, and Leave No Trace principles

### CAMPSITE MANAGEMENT GUIDELINES

*To achieve the campsite system objectives, the following campsite management guidelines would be followed.*

#### Natural Resource Protection

- ☐ Avoid or minimize campsites in areas with sensitive vegetation that are not resistant or resilient to trampling impacts, such as sandspits, wetlands, and dunes.
- ☐ Avoid or minimize campsites in erosion prone areas.
- ☐ Keep campsites to the minimum size necessary so as to minimize impacts on vegetation and soil communities.
- ☐ Avoid or minimize campsites in sensitive or key wildlife habitat, including minimizing the spatial interface between camping activities and bear activity.
- ☐ Provide appropriate food storage options in areas with known or likely bear activity.
- ☐ Minimize fragmentation of wilderness.
- ☐ Limit facilities in wilderness to only those needed for resource protection.
- ☐ Seek campsite locations that offer the most suitable substrate and are self-limiting due to vegetation, rock and/or topography. Seek sidehill opportunities where feasible. If natural

topography and vegetation are not self-limiting, campsite borders should be constructed and anchored (if needed). Guidelines for the use of campsite borders include: use as few constructed borders as necessary, limit the use of geometric shapes and straight lines, and use rustic materials to the extent practical.

- ☐ Construct desirable tenting areas (e.g., no obstacles, level ground) that are limited by topography, vegetation or rock to the extent possible. If natural topography and vegetation are not self-limiting, tent borders should be constructed and anchored (if needed). Guidelines for the use of tent borders include: use as few constructed borders as necessary, ensure good drainage, and use rustic materials to the extent practical.
- ☐ Provide reasonable separation of campsite cooking facilities (e.g., bear locker, fire pit and picnic table, if applicable) and desirable tent areas on campsites to concentrate trampling impacts and minimize bear and human interactions.
- ☐ Manage campfires according to the availability of downed firewood.
- ☐ In locations where fires are permitted and fire rings provided, standardize and reduce fire ring size (20-24 inches may be appropriate) to minimize the size of fires and use of firewood.
- ☐ Regulate axes and saws to minimize damage to trees and vegetation associated with campsites.
- ☐ Use site ruination strategies and signage (if needed) on unnecessary, peripheral use areas to concentrate camping activities on formal campsites and reduce campsite sizes.
- ☐ Provide education on Leave No Trace principles to visitors and outfitters.

### **Cultural Resource Protection**

- ☐ Avoid or minimize campsites in areas with significant archeological, sacred and historic sites, particularly those located in unstable substrate.
- ☐ If archeological or historic sites can't be avoided, use management techniques to minimize impacts to the resources and stabilize soils (e.g., maintain grass, use floating boardwalks).
- ☐ Consult with cultural resource advisors on campsite management activities to prevent further damage to sites caused by ground disturbing activities, both on campsites as well as in areas where borrow dirt or stone are gathered.
- ☐ Provide education on Leave No Trace principles.

### **Promotion of High Quality Visitor Experiences**

- ☐ Seek campsite locations that will be attractive to visitors.
- ☐ Provide campsites with reasonable access based on the mode of travel (e.g., motorized boat versus non-motorized).

- ☐ Avoid or minimize the potential for conflicts between user groups.
- ☐ Promote uncrowded and quiet campsites to the maximum extent possible.
- ☐ Provide privacy between campsites to the degree possible (conversational voices generally become unclear beyond 100 feet) and locate campsites out of sight from trails.
- ☐ Manage campsites to look as natural as possible, and minimize signage to the extent practical.
- ☐ Tenting areas (including constructed tent pads) should be sized for only one tent per area, and the number and size of tenting areas on a campsite should accommodate the allowed persons per campsite (e.g., individual campsites = up to 7 people, group campsites = up to 20 people) and the number of tents allowed per campsite.
- ☐ Provide visitors with information on the number and size of tenting areas on campsites being reserved.
- ☐ Provide visitors with site layout information so facilities associated with campsites are easily found (e.g., sign of site map at each campsite).
- ☐ Avoid or minimize safety hazards (e.g., tree fall).
- ☐ Provide education on Leave No Trace principles, campsite management strategies and visitor regulations.
- ☐ Match visitor needs to camping opportunities, to the extent feasible.
- ☐ Consider visitor use patterns when evaluating new campsite opportunities.
- ☐ Provide some universal access opportunities.

### **Sustainability of Park Operations**

- ☐ Maximize efficiency of accessing sites for maintenance purposes.
- ☐ To the extent feasible and appropriate, co-locate sites to improve efficiency of support facilities and reduce the development footprint on resources.
- ☐ Minimize the use of materials and facilities that require expensive and/or time consuming maintenance.
- ☐ Use toilets of minimum design needed to protect water quality, other natural and cultural resources and visitor safety.
- ☐ Continue regular maintenance and monitoring of campsites and associated facilities.
- ☐ Institutionalize an adaptive management framework (e.g., LAC/VERP) that justifies action in response to changing resource conditions or visitor experiences.

## Designated Camping Zone Management

### Background Information

Designated camping zone management as currently implemented at Apostle Islands National Lakeshore is relatively unstructured, allowing visitors maximum freedom in selecting preferred campsite locations. Visitors may camp on resistant, pristine sites or they can camp on established sites (sites that look like they have already been used by another visitor). This type of camping management strategy has the highest level of visitor freedom, but also can lead to the highest amount of site proliferation and use conflicts.

Currently, the low amount of use occurring in the camping zones at the park has not shown that the current management strategy is resulting in significant problems with resource or social impacts. The park staff does not have an inventory of visitor-created campsites in the designated camping zones, but it is estimated there are a few visitor-created campsites in the park. These campsites are more likely on islands that don't have designated campsites, like Bear and Hermit islands.

Few people camp in the zones (less than 3% of campers) and park staff do not encourage people to apply to camp in the zones—which may be why there have not been more resource and social impacts resulting from this type of camping policy. If these zones are to be promoted to increase the percentage of campers who use them, then more attention to the strategy for limiting impacts will be needed.

### Management Strategy

The park staff will continue unregulated zone camping unless monitoring indicates that a more structured approach is needed to minimize impact, and/or visitor use of zone camping greatly increases. The staff would monitor the presence and condition class of campsites (using the classification system below) within the designated camping zones. Monitoring human waste impacts around visitor-created campsites is also critical to ensure that these areas aren't being overused (e.g., if cat holes are used beyond 15–20 nights per year in an area, resource impacts from human waste could be a problem).

#### Condition Class Rating System:

- Class 0: Campsite barely distinguishable; no or minimal disturbance of vegetation and/or organic litter (often an old campsite that has not seen recent use).
- Class 1: Campsite barely distinguishable; slight loss of vegetation cover and/or minimal disturbance of organic litter.
- Class 2: Campsite obvious; minor to moderate loss of vegetation cover (10-40%) and/or organic litter crushed in primary use areas.
- Class 3: Moderate loss of vegetation cover (40-60%) and/or organic litter crushed on much of the site, some bare soil exposed in primary use areas. Some soil erosion indicated by exposed tree roots and minor shoreline disturbance.
- Class 4: Moderate- high loss of vegetation cover (60-90%) and/or organic litter crushed on much of the site, bare soil exposed in primary use areas. Soil erosion indicated by exposed tree roots and moderate shoreline disturbance.

Class 5: Nearly complete or total loss of vegetation cover (90-100%) and organic litter, bare soil widespread. Soil erosion obvious, as indicated by exposed tree roots and rocks and extensive shoreline disturbance.

If a different management strategy is needed, the following ideas would be considered:

- Design the designated camping zones in a concentric circle system, with a pristine site\* camping strategy on the island interiors, and an established site\*\* camping strategy on or near the island shorelines. If an established site could not be found on or near the shoreline, then visitors would be instructed to pristine site camp. Beach camping (below the leading edge of vegetation) would follow the pristine site strategy.
- All sites found in the pristine site camping area (interior of islands) would be closed and restored. In areas of the established site camping (on or near shorelines), sites that do not meet criteria for an acceptable site (e.g., too close to trails, near a sensitive resource), or those in unacceptable condition, would be closed and restored. If needed, the park staff will create established sites in desirable and acceptable locations to direct visitor use.
- Visitors would be educated on the designated camping zone management policy and would need to be prepared to camp in these areas. At the visitor center or on the park web site, campers could be required to watch a video and be tested on their knowledge. Another approach would be to develop a specific camping brochure for designated camping zone activities. Outfitters would be required to hand out Leave No Trace literature to visitors, particularly those who are spending a night in the park.

**Rationale for this approach:** Given the unique circumstances of island camping in the park, the concentric circle approach to managing the designated camping zones could be effective to allow for visitor freedom while also reducing the potential for visitor impacts. The island shorelines are the most popular (and most used) for camping activities since visitors tend to gravitate toward water, and the heat and insects associated with the island interiors make them less desirable for camping in June and July. The shoreline areas available for camping are relatively small, and given that these areas will likely continue to receive the most use, an established site camping policy could be an effective approach for providing a moderate level of visitor freedom while minimizing resource and social impacts in these areas. Given the lower number of visitors and the larger area available on the island interiors, these areas present an excellent opportunity for pristine site camping to allow for the highest levels of visitor freedom and opportunities for solitude. Camping on the beach, below the leading edge of vegetation, could follow the pristine site camping policy since resources are highly resistant and resilient, and it would provide another opportunity for visitors to choose their own campsite.

\**Pristine site camping* – visitors camp only on durable areas that have not been used by other visitors

\*\**Established site camping* – visitors camp only on sites that have been noticeably used by other visitors or are NPS designated campsites

**APPENDIX D: AERIAL PHOTO OF MOUTH OF SAND RIVER**



## APPENDIX E: CONSULTATION LETTERS



IN REPLY REFER TO:

### United States Department of the Interior

#### NATIONAL PARK SERVICE

Apostle Islands National Lakeshore  
415 Washington Ave  
Bayfield, Wisconsin 54814-9599

August 23, 2006

D18  
APIS

Eugene Bigboy, Tribal Chairman  
Bad River Band of Lake Superior Tribe of Chippewa Indians  
P.O. Box 39  
Odanah, Wisconsin 54861

Dear Mr. Bigboy,

As you probably know, the National Park Service (NPS) is developing a new General Management Plan/Wilderness Management Plan for the Apostle Islands National Lakeshore. About a month ago, your office should have received a document from the NPS titled *Options for Future Management*. This document, another copy of which is enclosed and which is also available for download at [www.nps.gov/apis/gmp.htm](http://www.nps.gov/apis/gmp.htm), describes where we are in this multi-year planning process.


After working closely with local tribes in recent years on a number of interim agreements related to off-reservation treaty rights, as well as a number of other major planning documents, we have come to appreciate the importance of the islands to Ojibwe culture. Since general management plans are visionary, big-picture plans designed to guide the park's management for 15-20 years, we think it is important to get some tribal input early in the planning process.

Bad River's views on the management of Long Island – which we understand Bad River refers to as Chequamegon Point – are especially desired. Other issues may no doubt be of interest to the tribe as well.

If you would like to speak to me about this important planning process for the Apostle Islands, you may contact me at 715-779-3397, extension 101. If you or your representatives would like to schedule a consultation, you may contact Chief of Planning and Resource Management Jim Nepstad at extension 102. While such consultations can be scheduled at any time of mutual convenience, we feel it would be especially useful if it could take place before the end of September. By October, we hope to begin the long process of preparing a draft General Management Plan/Wilderness Management Plan for the Apostle Islands National Lakeshore.

As always, we look forward to working with you!

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Krumenaker", followed by a large, stylized flourish or checkmark.

Bob Krumenaker  
Superintendent



IN REPLY REFER TO:

## United States Department of the Interior

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

October 27, 2004

D18  
APIS

Mr. Richard W. Dexter  
Compliance Coordinator  
State Historical Society of Wisconsin  
816 State Street  
Madison, Wisconsin 53706-1482

Dear Mr. Dexter:

The National Park Service has initiated the preparation of a General Management Plan (GMP) for Apostle Islands National Lakeshore near Bayfield, Wisconsin. The GMP will provide National Park Service managers a comprehensive planning framework for managing the park over the next 15 to 20 years. Consistent with the park's purpose, significance, and legislative mandates, the plan will identify strategies for achieving desired resource conditions, visitor experiences, and the appropriate types and locations of potential future development. In compliance with the National Environmental Policy Act and NPS policy, the GMP will be combined with an environmental impact statement (EIS). The GMP/EIS will identify significant issues and concerns, present a reasonable range of management alternatives for addressing these issues, and will analyze the environmental impacts of each alternative.

In accordance with provisions of the National Historic Preservation Act, and the 1995 Programmatic Agreement among the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers, we wish to invite the participation and consultation of the State Historical Society of Wisconsin in the GMP planning process. We will continue to keep you informed as the planning effort progresses over the next few years (our website at [www.nps.gov/apis/gmp.htm](http://www.nps.gov/apis/gmp.htm) has the latest schedule and other information), and welcome at any time your comments and advice on decisions regarding protection and preservation of Apostle Islands National Lakeshore's diverse array of significant historic properties.

Sincerely,

Robert J. Krumenaker  
Superintendent

Letters identical in content to this one were sent to all the tribes listed in the "Consultation & Coordination" chapter of this document.



U.S. REPLY REFER TO:

## United States Department of the Interior

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

October 27, 2004

D18  
APIS

Ray DePerry, Tribal Chair  
Red Cliff Band of Lake Superior Chippewa  
88385 Pike Road, Highway 13  
Bayfield, Wisconsin 54814

Dear Mr. DePerry:

As you may have already heard, the National Park Service (NPS) is beginning a multi-year planning effort to develop a new General Management Plan (GMP) for Apostle Islands National Lakeshore. A GMP is the guiding plan for a park, defining its vision and guiding its actions for a 15-20 year period.

We are aware of the importance of the Apostle Islands to the Ojibwe culture. For the past three years, we have been engaged in productive consultations with tribal governments, as well as with the Voigt Intertribal Task Force and Great Lakes Indian Fish and Wildlife Commission staff on matters related to wilderness and the exercise of treaty rights. We would like to expand these consultations to include any other issues that you feel might be important in the next 15-20 years. We request some time to meet with you or your representatives.

We will be starting with the assumption that the part of the park that we proposed for wilderness designation recently will be managed to protect the area's wilderness character. Other than that, we're starting with a pretty clean slate. Therefore, it is more important than ever for us to get as much input as possible from tribal governments, agencies, and organizations.

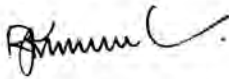
The comments we have received from various tribal governments during the course of the Wilderness Study were of tremendous value, and helped to shape the final wilderness proposal in significant ways. We hope that we can benefit from your thoughts again as we begin work on revising our GMP.

If you are interested in scheduling a consultation, please let us know. We can be very flexible in arranging the location, date, and time to suit your needs. We request that the meeting take place prior to the spring of 2005, as by that time we will begin to draft our preliminary alternatives.

Your staff may contact the park's Chief of Planning and Resource Management Jim Nepstad at 715-779-3398, extension 102 if they have any questions related to the study, or if you would like to schedule a meeting. You may also feel free to contact me directly at 715-779-3398, extension 101.

We appreciate your time and interest in this important matter, and we hope to hear from you soon.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Krumenaker", followed by a large, stylized flourish.

Robert J. Krumenaker  
Superintendent

## **APPENDIX F: LETTERS AND INTERNET COMMENTS PERTAINING TO THE SUBSTANTIVE ISSUES**

This appendix contains the letters and internet comments received after publication of the draft document that relate to the substantive issues discussed in chapter 6. Agency and organization letters are presented first, followed by letters from individuals. Following those letters are the internet comments pertaining to the issues.

**WISCONSIN DEPARTMENT OF  
ADMINISTRATION****JIM DOYLE**  
GOVERNOR**MICHAEL L. MORGAN**  
SECRETARYDivision of Intergovernmental Relations  
101 East Wilson Street, 9<sup>th</sup> Floor  
Post Office Box 8944  
Madison, WI 53708-8944  
Voice (608) 266-0288  
Fax (608) 267-6917 TTY (608) 267-9629

January 21, 2010

Michael Rees, Natural Resources Specialist  
National Park Service  
Division of Planning  
Denver Service Center  
P.O. Box 25287  
Denver, CO 80225-0287RE: Apostle Islands National Lakeshore:  
Draft General Management Plan and Environmental Impact Statement

Dear Mr. Rees:

Thank you for notifying the Wisconsin Coastal Management Program (WCMP) of the above project. Through its Federal Consistency authority, the WCMP reviews federally-affiliated projects that are likely to have impacts on coastal uses and resources within the coastal zone, defined as the fifteen counties adjacent to Lake Superior, Green Bay and Lake Michigan. The WCMP does not have any comments on the project and will not conduct a federal consistency review. This does not exempt the proposed project from requiring any other necessary state or local permits or authorizations. If you have any questions, please feel free to contact me at (608) 267-7988.

Sincerely,

Kathleen Angel  
Program and Planning Analyst  
Wisconsin Coastal Management Program



## Bayfield Heritage Association, Inc.

30 North Broad Street P.O. Box 137 Bayfield, Wisconsin 54814

Telephone: 715-779-5958 Email: [bayfieldheritage@centurytel.net](mailto:bayfieldheritage@centurytel.net)

Website: [www.bayfieldheritage.org](http://www.bayfieldheritage.org)



9

October 20, 2009

Apostle Islands National Lakeshore General Management Plan  
National Park Service  
Denver Service Center -- Greg Jarvis  
PO Box 25287  
Denver, CO 80225

Dear Mr. Jarvis,

The Bayfield Heritage Association and all Bayfield residents who cherish Bayfield history are very concerned about two aspects of the Apostle Island General Management Plan.

One item in the plan will turn the present Apostle Island National Lakeshore Visitor's Center into administrative offices permanently closing to the public the Historic Courthouse which the community raised \$700,000.00 to restore for the express purpose that this historic brownstone building be used as the Visitor's Center and open to the public.

The other item Bayfield Heritage Association adamantly opposes is the proposal to move the Apostle Islands National Lakeshore "core museum collection" from the Bayfield area to the Keweenaw facility in Calumet, Michigan, including the proposal outlined on pages 35 and 64-65 of the draft General Management Plan

This transfer proposal is presented in the GMP document as a *fait accompli*. It was not mentioned in the 2006 "Options for Future Management" document distributed to the public. There has been no consideration of better alternatives to keep the history of the Bayfield peninsula in the Bayfield area.

BHA understands that museum objects held by Apostle Islands National Lakeshore include a wide variety of items embodying the islands' historic heritage. **Many of them were donated to the National Park Service by community members with an understanding that their gifts would be used to preserve and interpret this heritage.**

Moving the park's museum collection is a gross violation of the trust placed in the NPS by the families and individuals who entrusted their artifacts, photographs and documents to the park service thinking this was the safest way to preserve this history for the future Bayfield community.

This move flies in the face of basic historic preservation principles, which call for preserving the connection between historic artifacts and their place of origin.

If park management is dissatisfied with the existing storage facility at Little Sand Bay, there are far better alternatives than moving the collection out of state, and these should be included in the final version of the GMP:



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

1

OCT 09 2009

REPLY TO THE ATTENTION OF:

E-19J

Apostle Islands National Lakeshore General Management Plan  
U.S. Department of the Interior  
National Park Service  
Denver Service Center – Greg Jarvis  
P.O. Box 25287  
Denver, Colorado 80225

**Re: U.S. EPA Comments on the Draft General Management Plan/Wilderness  
Management Plan/Environmental Impact Statement for Apostle Islands National  
Lakeshore, Bayfield and Ashland Counties, Wisconsin - EIS No. 20090283**

Dear Mr. Jarvis:

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed the National Park Service's (NPS) Draft Environmental Impact Statement (EIS), which evaluates the Apostle Islands National Lakeshore's (National Lakeshore) proposed Management Plan. Our review was conducted pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The National Lakeshore has been operating under a comprehensive management plan completed in 1989. Since that plan was completed, visitor use patterns have changed, people are seeking new recreational activities in the National Lakeshore, and the Gaylord Nelson Wilderness was designated in December 2004. Additionally, scoping activities and visitor surveys identified several issues that need to be addressed as part of a revised management plan.

The Draft EIS presents and analyzes the potential impacts of four alternatives. Alternative 1, the "no-action" alternative, is a continuation of the existing management approach. The concept for Alternative 2, the Preferred Alternative, is providing opportunities for more people to have an island experience. The concept for Alternative 3 is providing primitive, lake-oriented recreation and educational opportunities including new opportunities, and the concept for Alternative 4 is to provide a greater variety of structured recreation opportunities on the islands, in non-wilderness areas, and on the mainland. Alternatives focus on what resource conditions and what visitor uses, experiences, and opportunities should be available at the National Lakeshore. Details of how these conditions, uses, and experiences should be achieved will be analyzed as part of future detailed plans or studies.

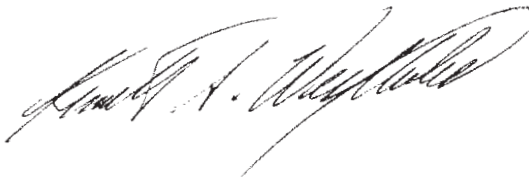
Based on our review of the Draft EIS, we have rated the Preferred Alternative as Lack of Objections. This rating indicates that our review did not identify any potential environmental impacts requiring substantive changes to the Preferred Alternative. Although we have no substantive comments on the Draft EIS, we recommend clarification of the following aspect of the Draft Management Plan.

The foundations for making user capacity decisions as part of the Management Plan include management zones, which qualitatively describe desired resource conditions and visitor experiences, including appropriate recreation activities, for different locations throughout the National Lakeshore. The Draft EIS presents five potential management zones. The three action alternatives were formulated by placing the management zones in different configurations on the National Lakeshore map according to the overall concept of each alternative.

Charts conveying the acreages and percentages of land assigned to each of the five management zones under the different action alternatives are included in the analysis portion of the Draft EIS. However, a similar table conveying current management zone acreages and percentages set by the 1989 comprehensive management plan is not provided in the Draft EIS. We recommend including these details of the 1989 zoning arrangement. Producing a table similar to *Table 7: Management Zones in Alternative 2* would be beneficial for comparing and comprehending differences in management zones between the current and proposed management plans.

We appreciate the opportunity to be a part of the planning effort for the National Lakeshore. We look forward to receiving a copy of the Final EIS. Should you have any questions concerning the contents of this letter, please do not hesitate to contact me or Kathleen Kowal of my staff at (312) 353-5206 or send email to [kowal.kathleen@epa.gov](mailto:kowal.kathleen@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth A. Westlake", written in a cursive style.

Kenneth A. Westlake  
Chief, NEPA Implementation Section  
Office of Enforcement & Compliance Assurance

cc: James Nepstad  
Enclosure: Ratings Summary

## SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION\*

### Environmental Impact of the Action

#### LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

#### EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS state, this proposal will be recommended for referral to the CEQ.

### Adequacy of the Impact Statement

#### Category 1-Adequate

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### Category 2-Insufficient Information

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment



## United States Department of the Interior

2

### FISH AND WILDLIFE SERVICE

Green Bay ES Field Office  
2661 Scott Tower Drive  
New Franken, Wisconsin 54229-9565  
Telephone 920/866-1717  
FAX 920/866-1710

September 17, 2009

#### Memorandum

To: Natural Resource Specialist, Division of Planning, National Park Service,  
Denver, CO, Attn: Michael Rees

From: Field Supervisor, ES Field Office, Fish and Wildlife Service, Green Bay, WI. *Jose Coenraets*

Subject: Review of Apostle Islands National Lakeshore General Management Plan/Wilderness  
Plan/EIS, Ashland and Bayfield Counties, WI

The U.S. Fish and Wildlife Service (Service) has received your electronic correspondence dated August 18, 2009, requesting our comments on the referenced project. Also provided for our review was your Draft General Management Plan / Wilderness management Plan / Environmental Impact Statement. This document examines four alternatives for managing Apostle Islands National Lakeshore (Lakeshore) for the next 15-20 years. You requested our concurrence on your determination that implementation of the preferred alternative as described in the Plan, may affect, but is not likely to adversely affect the federally-listed piping plover. Based upon a review of the information provided in your letter, and the information contained in the Plan, we concur with your determination that implementation of the preferred alternative may affect, but is not likely to adversely affect the piping plover, or result in the adverse modification of critical habitat.

The Lakeshore has previously implemented conservation actions to benefit the piping plover which have contributed significantly towards recovery of the species. We commend the National Park Service for their efforts, and look forward to continuing our strong partnership to benefit the piping plover.

These comments pertain only to the effects of your proposed action on federally-listed threatened and endangered species. The Service will submit any further comments we may have on other aspects of the Plan in separate correspondence.

We appreciate the opportunity to respond. Questions pertaining to these comments can be directed to Mr. Joel Trick at 920-866-1737.

## United States Department of the Interior

3

NATIONAL PARK  
SERVICE

Great Lakes Network Office  
Suite D  
2800 Lake Shore Drive East  
Ashland, WI 54806

*Providing Inventory & Monitoring services to: Apostle Islands National Lakeshore, Grand Portage National Monument, Indiana Dunes National Lakeshore, Isle Royale National Park, Mississippi National River and Recreation Area, Pictured Rocks National Lakeshore, Sleeping Bear Dunes National Lakeshore, St. Croix National Riverway, and Voyageurs National Park.*

---

10/06/2009

**Office Memorandum**

**To:** Superintendent, APIS

**From:** Coordinator, GLKN

**Subject:** Review and comments on the Apostle Islands National Lakeshore Draft General Management Plan, Wilderness Plan, and Environmental Impact Statement

Thank you for the opportunity to comment on this important draft GMP/EIS. The park's preferred alternative seems a reasonable choice. The following comments are a composite from employees at the Great Lakes I&M Network. If you have questions please give me a call.

General Considerations

Throughout the draft GMP/EIS the importance of inventory and monitoring (I&M) of natural resources is recognized. The park's natural resource staff have done an excellent job of joining forces with tribal, state, and other federal agencies and NGOs to meet many of these I&M needs. There are examples of some of those collaborations, yet we found little mention of the Servicewide mandates and efforts by both park and Network employees to plan, implement, and report on long-term monitoring for core indicators under the I&M program. We suggest that either under "Special Mandates and Administrative Commitments" on pages 15-17, or under the "Topic of Natural Resources and Diversity" on page 22, paragraph 1, the GMP/EIS should state... *"The National Parks Omnibus Act of 1998 established the framework for integrating natural resource inventories and monitoring into park management. Section 5934 requires the Secretary of Interior to develop a program of "inventory and monitoring of National Park System resources to establish baseline information and to provide information on long-term trends in the condition of National Park System resources."*

To substantiate the park's efforts towards the I&M directives, under 'Strategies' on page 23 we recommend stating that in addition to the I&M projects the park conducts, *"...NPS staff, as part of the Great Lakes Inventory and Monitoring Network, implemented in 2006 a program to monitor core indicators (vital signs) of long-term ecological change."*

On pages 73-74 the GLKN long-term monitoring plan could be referenced since it has implications to park resource activities and management. Suggested wording:

***Long-Term Ecological Monitoring Plan – Great Lakes I&M Network (2007)***

This plan was implemented in 2006 and includes staff and project funds shared with Apostle Islands and eight other parks for monitoring a core set of indicators of ecological change. Indicators currently being monitored at APIS under this program are: water quality in selected lagoons, a suite of environmental contaminants, a set of permanent terrestrial vegetation plots, and metrics of land cover / land use change. The program also assists the park in gathering data on weather/climate, and land birds.

Citation for reference section - Route B., and J. Elias (editors). 2007. Long-term ecological monitoring plan: Great Lakes Inventory & Monitoring Network. Natural Resources Report NPS/GLKN/NRR-2007/001. National Park Service, Fort Collins, Colorado.

Other recommendations:

1. Though gray wolves are mentioned in the “Wildlife” portion of Chapter 4 (Affected Environment, p. 179), the statement that they “do not live permanently in the park” is probably not correct, given recent observations on Sand Island. A recent wolf-territory map developed by the Wisconsin DNR suggests the Echo Valley Pack, a mainland wolf-pack that has been monitored since at least 2004, has now incorporated Sand Island as part of its territory<sup>1</sup>. This map is based on observations of wolves and wolf sign by WIDNR and NPS staff. The wolf population on the Bayfield Peninsula has been expanding over the last 15 years<sup>2</sup> and use of the mainland portion of APIS, as well as Sand Island, will likely increase. The wolf population in northern Wisconsin has reached densities whereby wolves, both transients and pack-wolves, should, in our opinion, be considered “resident” in the Bayfield Peninsula including APIS. The wolf’s return to Federally endangered status<sup>3</sup> makes it necessary for the GMP/EIS to formally address potential impacts to wolves and wolf habitat from recreational development, particularly on Sand Island and the Mainland portion of the park. In addition, wolves should be addressed in the “Threatened and Endangered Species” portion of Chapter 4 (p. 182), where only the Piping Plover is currently mentioned.
2. The Partners in Flight *North American Landbird Conservation Plan*<sup>4</sup>, of which the National Park Service is a signatory partner, identifies seven bird species that regularly nest within the lakeshore and are of “continental importance” in the Northern Forest Avifaunal Biome. Species of “continental importance” are those deserving special consideration in conservation planning and implementation. Two of the seven (the Golden-winged Warbler and the Canada Warbler) are also Watch List species (those having the greatest range-wide concerns and are most in need of conservation attention). The seven species and their “action categories” are:

Golden-winged Warbler (Immediate Action)  
Canada Warbler (Management)

Chestnut-sided Warbler (Management)  
Alder Flycatcher (Long-term Planning and Responsibility)  
Swamp Sparrow (Long-term Planning and Responsibility)  
Nashville Warbler (Long-term Planning and Responsibility)  
Black-throated Green Warbler (Long-term Planning and Responsibility)

The “action categories” are defined as follows:

*Immediate Action:* Immediate action is needed to either reverse or stabilize significant, long-term population declines of species with small populations, or to protect species with the smallest populations for which trends are poorly known. This applies to species whose populations are at risk of extirpation over broad portions of their range, and for which immediate and focused attention to their needs represents the highest conservation priority for landbirds.

*Management:* Management or other on-the-ground conservation actions are needed to reverse significant, long-term population declines or sustain vulnerable populations. This applies to many species that are still relatively widespread, but for which actions are necessary to prevent them from becoming in danger of regional or range-wide extirpation in the future.

*Long-term Planning and Responsibility:* Long-term planning is needed to maintain sustainable populations. Applies to species with relatively stable or increasing populations regardless of population size, or relatively abundant species for which population trends are poorly known.

At a minimum, the GMP should consider and explicitly address the habitat needs for and potential impacts of recreational developments to the top three species: Golden-winged Warbler, Canada Warbler, and Chestnut-sided Warbler.

3. In addition to #2 above, it is unclear if Long Island’s status as an Important Bird Area (IBA) will be considered in relation to the potential development of park housing there. The Kakagon/Bad River Wetland Complex and Forest Corridor IBA and the Apostle Islands National Lakeshore IBA were designated on the basis of “an incredibly rich and diverse mix of breeding birds of forest, shrub, and wetland habitats” and “an outstanding concentration area for migrating birds, especially in the fall, hosting tens of thousands of passerines and raptors.”<sup>5</sup> It may be that consideration given to potential impacts to Piping Plovers also sufficiently addresses the other species that make Long Island an IBA. However, a separate treatment may be beneficial to ensure no negative effects.
4. On page 179, it is stated that four species of bats occur in APIS; however, in 2003 an inventory funded and published by the I&M program documented six species present in the park<sup>6</sup>.
5. On page 178, paragraph 2, it’s stated that 37 species of mammals are known to occur in the park. The certified NPSpecies list for APIS shows 31 species verified, 10 species probably present, 4 unconfirmed, and 1 historic. Recent information suggests that this list should be

up-dated to include 32 verified, 12 probably present, 5 unconfirmed, and 1 historic. Either way, our numbers don't match. We might take this opportunity to cross-reference our information and agree to an up-dated version and get it re-certified in NPSpecies.

6. Page 179, typo in citation, column 2, line 12 – Should read “Belant” not Delant as printed. The spelling is correct in the references section.
7. You might check for consistency in use of author names versus “NPS” in citations. For example, Ledder is cited using the traditional technical report citation of author and year in the text, while Moraska et al, was cited as “NPS 2005”. We prefer the technical report citation which implies a peer-review process. On a related issue, we noted several instances of “personal communication”, where statements could be supported by a published report. We would be happy to locate literature to support some statements if you wish to do so.
8. We suspect this draft GMP/EIS was written prior to some of the more recent reports being made available from the I&M program. A couple updated citations might be prudent:
  - a. On page 170, column 2, paragraph 2 – data from the I&M monitoring of water quality in APIS is available in annual reports published in 2007 and 2008. You could cite the most recent report as Elias, J. 2008. Monitoring water quality in inland lakes, 2008 – annual summary report. Great Lakes Inventory and Monitoring Report GLKN/09/01.
  - b. On page 171, column 2, paragraph 3 – please replace Route 2006, which is an unpublished briefing with: Route, B., and R. Key. 2009. Contaminants in bald eagle nestlings at Apostle Islands National Lakeshore, Mississippi National River and Recreation Area, and the St. Croix National Scenic Riverway: Data summary 2006—2008. Natural Resource Data Series NPS/GLKN/NRDS—2009/001. National Park Service, Fort Collins, Colorado.
9. Below are some additional works completed by the I&M program which could support information in the draft GMP/EIS. They are readily available on the Network's web site:

Allison, T. D. 2006. Canada yew and white-tailed deer at the Apostle Islands: Summary of research to date with recommendations for continued monitoring and management. GLKN/2006/04.

Gorman, O. T. and S. A. Moore. 2006. Inventory of nearshore fish population densities and community structures at Apostle Islands National Lakeshore and Isle Royale National Park. GLKN/2006/05.

Smith, G. and F. Maragi. 2003. Small Mammal Inventory of the Apostle Islands National Lakeshore. GLKN/2004/01.

References cited:

- <sup>1</sup> Wisconsin Department of Natural Resource unpublished map. Available on-line at: [http://dnr.wi.gov/org/land/er/mammals/wolf/wolf\\_map.htm](http://dnr.wi.gov/org/land/er/mammals/wolf/wolf_map.htm). Accessed 9/24/2009.
- <sup>2</sup> Wydeven, A. P., and J. E. Wiedenhoeft. 2008 Wisconsin endangered resources report #137: Status of the timber wolf in Wisconsin, Performance report 1 July 2007 through 30 June 2008.
- <sup>3</sup> U.S. Fish and Wildlife Service. 2009. Endangered and threatened wildlife and plants; Reinstatement of protections for the gray wolf in the western Great Lakes in compliance with settlement agreement and court order. Federal Register 74:47483-47488.
- <sup>4</sup> Rich, T.D., C.J. Beardmore, H. Berlanga, P.J. Blancher, M.S.W. Bradstreet, G.S. Butcher, D.W. Demarest, E.H. Dunn, W.C. Hunter, E.E. Iñigo-Elias, J.A. Kennedy, A.M. Martell, A.O. Panjabi, D.N. Pashley, K.V. Rosenberg, C.M. Rustay, J.S. Wendt, and T.C. Will. 2004. Partners in Flight North American landbird conservation plan. Cornell Lab of Ornithology, Ithaca, NY.
- <sup>5</sup> Steele, Y., editor. 2007. Important Bird Areas of Wisconsin: Critical sites for the conservation and management of Wisconsin's birds. Wisconsin Department of Natural Resources, Madison.
- <sup>6</sup> Kruger, L., and R. O. Peterson. 2008. Occurrence of temperate bat species at three national parks in the Great Lakes region. Natural Resource Technical Report NPS/GLKN/NRTR-2008/128. National Park Service, Fort Collins, Colorado

Again, thanks for the opportunity to comment and don't hesitate to call if we can be of assistance.



United States  
Department of  
Agriculture

Forest  
Service

**CHEQUAMEGON-NICOLET NATIONAL FOREST**

Park Falls Supervisor's Office  
1170 4<sup>TH</sup> Avenue South  
Park Falls, WI 54552  
715-762-2461  
715-762-5179 (Fax)  
TTY: 711 (National Relay System)

Rhineland Supervisor's Office  
68 S. Stevens St.  
Rhineland, WI 54501  
715-362-1300  
715-362-1359 (Fax)  
Internet: [www.fs.fed.us/r9/cnnf](http://www.fs.fed.us/r9/cnnf)

File Code: 1530

Date: October 23, 2009

Bob Krumenaker  
Superintendent  
Apostle Islands National Lakeshore  
415 Washington Avenue  
Bayfield, WI 54814

Dear Mr. Krumenaker,

The USDA Forest Service, Chequamegon-Nicolet National Forest, has received a copy of the National Park Service, Draft General Management Plan/Wilderness Management Plan and Environmental Impact Statement for Apostle Islands National Lakeshore, and a letter requesting comments.

The four alternatives identified provide a broad overview with sufficient information on their individual merits, and the reasoning behind the preferred alternative. It appears the National Park Service has done a thorough job addressing the ecological, economic, social, cultural, and recreational values of the region throughout all of the alternatives.

The National Park Service and the U.S. Forest Service share a responsibility as public land managers in northern Wisconsin. We also have two areas of common interest: Operation of the Northern Great Lakes Visitor Center (NGLVC); and wilderness management. It is important that we continue to collectively provide visitors with accurate resource related information, and manage wilderness in an attempt to maintain its inherent character. The commitment of the National Park Service to the cooperative operation of the Northern Great Lakes Visitor Center, as identified in all four alternatives, will ensure its continued success. The potential addition of a NPS waterfront visitor center, as identified in the Preferred Alternative, would be an ideal opportunity to complement the existing services available at the NGLVC.

We appreciate the opportunity to respond to the NPS Draft General Management Plan/Wilderness Management Plan and Environmental Impact Statement. Please provide us with copies of future review documents that may be associated with the project. We look forward to continuing our involvement with your planning process in this important and visionary endeavor.

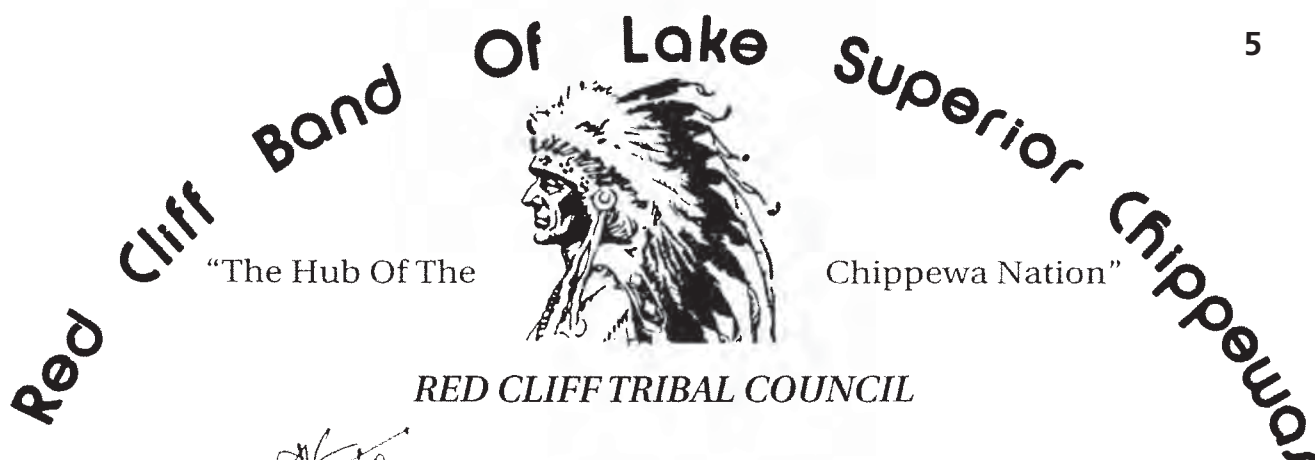
Sincerely,

A handwritten signature in dark ink, appearing to read "Jeanne M. Higgins", written over a horizontal line.

JEANNE M. HIGGINS  
Forest Supervisor

cc: William C Johnson, Steve Hoecker, Bill Sullivan, Don Hoppe

OCT 26 '09 AM11:46



December 29, 2009 *AK 1/10*

Robert J. Krumenaker  
 Superintendent  
 National Park Service  
 Apostle Islands National Lakeshore  
 Rte 1, Box 4  
 Bayfield, Wisconsin  
 54814-9599

Dear Mr. Krumenaker,

The Red Cliff Tribal Administration and the Red Cliff Treaty/Natural Resources Division have reviewed "The Apostle Islands National Lakeshore Draft General Management Plan, Wilderness Management Plan, and Environmental Impact Statement," further discussed as Draft Plan or Plan in this document. The intent of this letter is to provide to the National Park Service a comprehensive list of Tribal comments and concerns pertaining to the Draft Plan. Please note that the comments and concerns listed in this letter reflect issues related to the environment, natural resources, economy, and cultural resources shared between the National Park Service, the Tribe, and the General Public.

The Apostle Islands and the waters surrounding them are extremely important to the Red Cliff Band of Lake Superior Chippewa. The Anishinaabe spiritual, religious, and cultural beliefs have been connected to the water for a thousand generations. The path followed by our Anishinaabe ancestors during the Great Migration, was determined by the appearance of the sacred Megis of the Midi and by following such path, as prophesized by our Creator, the water would provide sustenance to our people. Our religion recognizes this through our clan designations, spiritual ceremonies, and beliefs. The significance of our culture and our people's use of resources provided by the air, land, and water have been demonstrated and upheld throughout the Treaty Era and have been reaffirmed through recent state and federal court actions. The Red Cliff Band of Lake Superior is a sovereign nation and has been federally recognized since 1936.

The Tribe does support many aspects of the Plan including those for shoreline protection to reduce erosion caused by land use practices, prevention and eradication of invasive species, as well as restoring native vegetation in areas of high human use such as Meyers Beach and Long Island. Currently, the Tribe is conducting work that is similar to this within the exterior boundaries of the reservation. More

specifically, our staff is working on a shoreline monitoring project that will identify important natural resource features to assist in developing land use decisions that will maintain natural resource integrity.

Throughout the document we have noticed that mention of the Tribe and their connection to the Park has been missing. Specifically, there is no mention of the Ojibwe or the Red Cliff Tribe and the importance of the Native Americans in the “Brief Description” located in Chapter 1, pg. 6 of the Plan. It is believed that this oversight could be remedied by including information about Ojibwe and their use of the Park prior to European settlement to present day.

In Chapter 1, pg. 20, the Plan states “NPS managers will seek relations with adjacent tribal governments that will keep the NPS managers informed about the Tribe’s activities that may affect the park.” We believe this statement needs to either be omitted or altered to reflect that activities of the Park can impact the Red Cliff Tribe. Along these lines, Chapter 2, pg. 87, mentions the Park “grappling” to manage parts of the wilderness where cultural resources are present. As with the previous statement, this language leads the reader to think that the Tribe hinders activities of the Park and has negative impacts to the Park. We believe that this feeling is an untrue representation of the Tribe and needs to be corrected. Also we feel that if issues do arise formal consultation would be the best action to take. Perhaps it should be noted within the Plan that actions are currently taking place to address traditional harvest within the Park and jurisdictional issues on the mainland.

We did note that the Wilderness Management Plan is standard across all alternatives in the Plan as it should be in accordance with the Wilderness Act of 1964. However, the proposed Wilderness Management Plan demonstrates the lack of a current cultural resource inventory thus, placing limitations on the Park’s future actions to identify and protect these resources. There is concern that preservation and protection of areas of significant cultural and historic properties that may be found within the Parks exterior boundaries may be affected by some of the management actions. The impacts table and the narrative located in Chapter 4 pg. 197, summarizes this stating that there would be no adverse impact to ethnographic resources, and yet also states there has been limited research completed pertaining to ethnographic resources. This follows with an explanation of historical use of the area by Native Americans. It should be made clear that if the ethnographic use has been curtailed within the Park that in itself is an ethnographic impact.

As demonstrated in the introduction of this letter, the Tribe considers the waters of Lake Superior significant Traditional Cultural Property of the Ojibwe Nations. We understand that the current designation of Outstanding Water Resource only applies to the lakeshore boundaries and does not affect 85% of the water with in the Park, which defaults to jurisdiction of the State of Wisconsin. It is felt that further definition of the Park boundaries is needed to protect these waters.

The Preferred alternative, Alternative 2, is the most expensive, environmentally preferred alternative, but includes an increase in the Island experience and increase in transportation opportunities. With the increase of Park visitation and use, there develops the potential for increase of trespass on Tribal land. The Plan should address the issue that not all land along the shoreline is Park, and that there is Reservation land surrounding the Park’s mainland unit. Many of the areas along the reservation

shoreline are protected for Tribal Member use only and needs to be respected by the general public and visitors of the Park.

The preferred alternative calls for a new trail between Little Sand Bay and the Sand River, but the trail is not mapped within the alternative. The Tribe has concerns that a trail placed in this area and the increase in use of the area would negatively impact the resources.

It was noted that Alternative 3 has an Ojibwe cultural component, a demonstration site, we feel that this should be included in the preferred alternative. Further, the Park should work cooperatively with the Tribes to create such a site. In the past, many Tribal members assisted the Park and its staff in relaying cultural information to visitors. The Tribe had members who lived at the Manitou Fish Camp to describe the fishery. Other members were employed as liaisons/naturalists between the Park and the Tribe. We feel that this must be pushed forward; much of the Tribes culture lies within the Islands and needs to be protected as well as used for educational purposes.

Located in the section titled "Future Studies" the Park service is seeking commercial ventures to increase revenue. The Tribe feels that they should be involved in such a study with the Park as the Reservation is a launching point to the Islands as well. It should be understood by the Park that the Tribe is also interested in participating if possible with other activities and studies including the creation of a stewardship plan, cultural resources studies, climate change studies, and commercial service strategy creation.

The Tribe also desires to have included in the plan a statement that would reflect the Apostle Island National Lakeshore will work with the Tribe by utilizing PL93-638 Indian Self Determination Act as a mechanism to contract with the Tribe for various services including but not limited to natural resource management, operation and maintenance, facilities management, enforcement, water transportation and culturally relevant educational activities.

The Tribe looks forward to working with the National Park Service in the Apostle Islands through cooperative agreements or as mutual beneficiaries with projects of all types. We appreciate the process of face-to-face formal consultation between the Park Service and the Tribe with an expectation towards our comments and concerns being addressed in the final version of the Parks Management Plan.

Sincerely,



Rose Soulier, Chairperson

Red Cliff Band of Lake Superior Chippewa

Cc: Secretary Salazar, US Department of the Interior  
Assistant Secretary Echo Hawk, US Department of the Interior - Indian Affairs  
Red Cliff Tribal Council  
Red Cliff Treaty/Natural Resources Division  
Dave Ujke, Red Cliff Tribal Attorney  
Mark Montano, Red Cliff Director of Tribal Operations



WISCONSIN  
HISTORICAL  
SOCIETY

October 6, 2009

Mr. Jim Nepstad  
Acting Superintendent  
Apostle Islands National Lakeshore  
415 Washington Ave.  
Bayfield, WI 54814-9599

SHSW#: 04-1084/BA

RE: Apostle Islands National Lakeshore General Management Plan

Dear Mr. Nepstad:

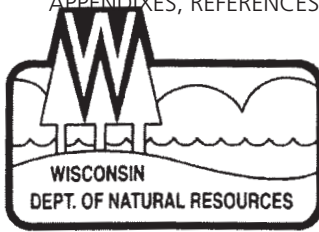
We have reviewed "Apostle Islands National Lakeshore: Draft General Management, Wilderness Management Plan, Environmental Impact Statement". As written, we believe Alternative 2, the preferred alternative, provides the best treatment options for the preservation of historic properties.

Although the management plan provides for the Section 106 review process and consultation with the public, we believe that the management plan should provide a more in depth discussion of agency responsibilities under Section 110 of The National Historic Preservation Act. A more in depth discussion could address the responsibilities of the Apostle Islands National Lakeshore as it pertains to the way that it plans for the identification, evaluation, interpretation, and preservation of their historic properties thereby providing a more comprehensive and balanced management plan.

Please call me at (608) 264-6507 if you have any questions concerning this matter.

Sincerely,

Sherman Banker  
Wisconsin State Historic Preservation Office



## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor  
Matthew Frank, Secretary

101 S. Webster St.  
Box 7921  
Madison, Wisconsin 53707-7921  
Telephone 608-266-2621  
FAX 608-267-3579  
TTY Access via relay - 711

October 23, 2009

7

Mr. Robert Krumenaker  
Superintendent, Apostle Islands National Lakeshore  
415 Washington Avenue  
Bayfield, WI 54814

RE: Draft General Management Plan, Wilderness Management Plan, and Environmental Impact Statement

Dear Mr. Krumenaker:

Thank you for the opportunity to review and comment on these draft plans. We acknowledge and appreciate that these plans include and address the issues that we previously identified during the Options for Future Management planning phase.

The Apostle Islands National Lakeshore (AINL) contains a unique complex of ecosystems of global significance. The natural resources of the AINL are an extremely important and valuable asset to Wisconsin, its residents, and visitors.

Since the AINL was created we have enjoyed a very cooperative working relationship with the National Park Service. In many cases we have over-lapping and concurrent legal jurisdictions and responsibilities, including hunting, fishing, trapping, and navigation. The draft plans appropriately identify and acknowledge this. As new issues and concerns develop, we will continue to work cooperatively together to address and resolve them.

In the General Management Plan, Chapter 1, under the Special Mandates and Administrative Commitments section we request that you include the following:


**Memorandum of Understanding with the Wisconsin Department of Natural Resources Regarding Cooperative Natural Resources Management.** The National Park Service signed a memorandum of understanding with the Wisconsin Department of Natural Resources on September 20, 1985 to implement joint and cooperative endeavors toward achieving maximum public benefits and sound management of the Natural Resources involved. On January 22, 1990 an addendum to the memorandum was signed to jointly prepare a management plan for each site proposed as a State Natural Area.

Three of the alternatives include a new Operations Center and two of the alternatives include a new Visitors Center on the Bayfield waterfront. These facilities will mostly likely require Waterway Protection permits from the State. We will work cooperatively with you to help you address your operations and visitor service needs while we meet our obligations to ensure that water recreation, water quality, habitat and natural scenic beauty are protected.

Overall the draft plans are very thorough and complete. All four of the alternatives are acceptable management plans. The Department can support the selection of any of the four alternatives. The Department supports and recommends selection of the preferred alternative (#2) since it will provide for the largest amount of natural resources protection, management, and restoration for visitor use.

Thank you for the opportunity to review and comment on these draft plans. We look forward to continuing the strong cooperative working relationship between our agencies.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Frank", with a stylized flourish at the end.

Matthew Frank  
Secretary

- The "preferred alternative" calls for construction of a brand-new park visitor center and conversion of the Bayfield courthouse to administrative space. Surely designs for one of these sites could accommodate dedicated museum storage.
- Rather than move the Apostle Islands collection out of the area, the NPS could explore cooperative agreements with the Wisconsin State Historical Society -- which maintains an archive in Ashland and a museum on Madeline Island -- or the Bayfield Heritage Association, which has an excellent facility that might be adapted to provide jointly administered museum storage.

It is critical that artifacts pertinent to the history of Bayfield and the islands stay in the Bayfield area. While they are our history, they are also our future identity.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry Phillips". The signature is fluid and cursive, with a large loop at the end.

Jerry Phillips, President  
Bayfield Heritage Association

Cc: Superintendent Bob Krumenaker  
Congressman David Obey  
State Assemblyman Gary Sherman



10

## APOSTLE ISLANDS HISTORIC PRESERVATION CONSERVANCY

*Promoting the Preservation, Enhancement and Appreciation of the Historic and Cultural Resources of the Apostle Islands Region*

Mr. Greg Jarvis  
Project Leader  
Apostle Islands National Lakeshore  
General Management Plan  
National Park Service  
Denver Service Center  
P.O. Box 25287  
Denver, CO 80225

**RECEIVED**

**OCT 26 2009**

**DSC-P**

Dear Mr. Jarvis:

On behalf of the Board of the Apostle Islands Historic Preservation Conservancy (AIHPC), I am pleased to submit these comments on the draft General Management Plan (DGMP) for the Apostle Islands National Lakeshore (APIS). The mission of the Conservancy is to "promote the preservation, enhancement, and appreciation of the cultural resources of the Apostle Islands region of Lake Superior." The DGMP raises issues that are important to the Conservancy, and we look forward to working with the National Park Service (NPS) to achieve these goals within APIS.

The Conservancy commends the Service for its hard work in preparing the detailed and informative DGMP. The Plan reflects the strong effort of the Park Service team. We also commend the NPS staff at the Lakeshore for their hard work to protect the resources of the park. There is much more work that lies ahead, and we are grateful for the commitment to the task demonstrated by the local staff.

The Conservancy is pleased that the DGMP places a strong emphasis on the historic and cultural resources of APIS. The Lakeshore is perhaps one of the most unique areas within the National Park System in that it contains exceptional wilderness qualities *and* a proliferation of historic properties that either are in excellent condition (as is true of all of the historic life estate properties and those structures for which NPS has been provided with adequate resources to preserve) or can still be readily preserved and maintained for the benefit of future generations with the investment of time and resources.

Even more unique are the surviving links to the past that exist through the committed and energetic community within which APIS is located. As the Conservancy itself has discovered, there is an exceptional network of community support for not only preserving the structures that speak to the deep and rich history of the Islands, but also for connecting the federal management and the public to the very people who have lived that history. As the Park Service moves forward in fulfilling its historic preservation responsibilities at APIS, the Conservancy

Mr. Greg Jarvis

October 22, 2009

Page 2

encourages the Service to take advantage of this wellspring of support and historical continuity found within the surrounding communities, including the Red Cliff and Bad River Tribes.

The importance of this continuity has recently been tangibly recognized in national parks such as Shenandoah and Great Smokies, and presents itself even more clearly at Apostle Islands. There are many different partnership and management tools that can be used for this purpose. The DGMP, the 2006 scoping plan, the 2001 APIS Business Plan, and NPS plans and directives provide the mechanisms for involving the community, historic use families, and others in the APIS management program. Indeed, creative use of partnerships could provide for appropriate levels of public education and visitation at the historically significant life estate properties during the use and occupancy terms, as well as long-term maintenance and preservation after the rights expire. We note with approval the endorsement of arrangements of this nature in the 2001 Business Plan. The Conservancy looks forward to assisting in these efforts.

For purposes of this letter, we reference the Conservancy's 2006 scoping comments, which are incorporated in this letter. Some of the issues raised in those comments have not been addressed.

As stated, we are delighted to see multiple references to the intent of the Service to rely on partnerships and donated assistance for achieving historic preservation goals. There are many tools for doing so, and similar methods have been used at numerous national parks (Indiana Dunes, Cape Cod, Cuyahoga Valley, Delaware Water Gap, Fire Island, etc.). The general reference to this partnership approach should be developed in more detail in the final GMP.

With regard to alternatives, none of the proposals provides a single presentation of the management actions considered desirable by the Conservancy. We agree with the public statements made by APIS management that the public "likes the Lakeshore the way it is" and that minimal changes should be made. The preferred alternative, however, does not follow this position and would result in major changes, including the removal of the visitor center at Little Sand Bay, the termination of visitor services at the Bayfield courthouse building, the termination of the Roys Point facilities used by NPS, the construction of a new visitor center on the waterfront at an undisclosed location, the transfer of treasured local artifacts to a distant storage center, and the apparent intent to prohibit educational events in the wilderness. These are all actions that the Conservancy does not favor, and, as a result, we do not support the preferred alternative. Its price tag is too high considering the scarcity of federal funds for other priorities within APIS. It also would result in dramatic changes from the status quo. The Conservancy requests that the final GMP make a commitment to preserving what currently exists before expending significant sums on new projects that would not add much to the current visitor experience and could result in the loss of historic continuity.

None of the other alternatives combines the desired actions into a single proposal. This is, no doubt, the result of the difficulty of trying to craft one alternative that accounts for such a broad array of actions and projects. The no action alternative most closely adheres to the APIS management's public statements of intent to keep things the way they are, but even that option

Mr. Greg Jarvis  
October 22, 2009  
Page 3

would benefit from more flexibility by covering needed actions such as lighthouse restoration, visitor center enhancement at Little Sand Bay, and partnership agreements for projects such as restoration of the Plenty Charm cottage at East Bay, the John Nelson cabin at Little Sand Bay, and the maintenance of any life estate properties for which use and occupancy terms would expire during the life of the final GMP. All of these actions have a broad base of community support. We therefore recommend that the Service use its planning discretion to craft a more flexible set of final management actions that do not derive exclusively from any one the four alternatives in the DGMP.

We have several specific comments on the DGMP.

The Conservancy strongly endorses the emphasis on “cultural landscapes” and “opportunities to understand the significant stories of the Apostle Islands” as “impact topics.” We also recommend that the final GMP place a similar emphasis on “traditional cultural landscapes” that relate to the Tribes, which should include consideration of the significance of the water itself as a contributing element to those landscapes. As stated above, these objectives can be best achieved by taking advantage of the commitments of the Tribes, local residents, nonprofit groups (including the Conservancy), and the historic Island families.

On page 47, the DGMP states that many of the life estate structures have been “well maintained, but some are in poor condition.” The Conservancy is aware of *no* life estate buildings that are in “poor condition.” This statement should be deleted. Also, the properties are not held by “lessees” as stated on this page. They are subject to life estate use and occupancy rights, not “leases.” With regard to the statement on page 238 about prioritizing preservation treatments at the life estate properties upon the expiration of the current rights, the Conservancy believes that *all such properties should be treated equally*. The remaining use and occupancy structures are all of extraordinary historical significance and should be uniformly accorded the highest preservation status.

The Conservancy sees no reason why “[a]ll education and interpretation efforts will be located outside the wilderness area,” as discussed on page 92. There is nothing about education that is fundamentally at odds with wilderness. Indeed, the pioneering historical research and educational efforts of Dr. Cronon, Dr. Feldman, and others focus on APIS wilderness. The APIS legislative history is replete with references to the educational function of the park, and nothing in the APIS wilderness designation or the Wilderness Act itself calls for a ban on educational activities within the wilderness area. Appropriate educational and interpretation events should be allowed in the wilderness.

The zone concept described on pages 104-109 is confusing. It would seem that there should be a “wilderness zone.” Instead, there is a “backcountry zone” and a “primitive zone,” both of which, by the definitions included in the DGMP, seem to apply to “wilderness.” In addition, under Alternatives 3 and 4, areas that were expressly excluded from wilderness, such as Sand Island, would be zoned as “primitive.” Under the preferred alternative, most of Sand Island and Basswood Island would be “backcountry.” To be consistent with the APIS wilderness

Mr. Greg Jarvis  
October 22, 2009  
Page 4

legislation, which expressly excluded the two Islands from wilderness, these locations should be “historic.” In addition, all alternatives appear to fail to identify important historic and cultural sites, such as East Bay and the East and West Bay roads, as “historic.” The preferred alternative seems to exclude even the Hanson farmstead from being a historic zone and, depending on the intent of the corresponding map, would exclude all properties to the west of the former East Bay Road (i.e., Camp Stella, Campbell cottage) at Shaw Point.

The Final Plan should further explain and clarify the zoning concept and make the necessary revisions, especially to ensure that all historic properties are included within the properly drawn historic zone.

The Conservancy maintains its position from the 2006 scoping comments that NPS should make every effort to avoid *any* loss of historic resources. Certainly, this principle applies to all National Register listed and eligible properties. It also applies to other properties that are of historic value, but are not involved in National Register designation. In this regard, the Conservancy is concerned over the DGMP statement that “[s]tructures that are not listed in the national register, are unsafe, or do not have utility for park operations would be removed and the areas restored, or in some cases allowed to molder to natural conditions.” For example, a structure could be of historic importance or relevant to the management goal of “understanding significant stories of the Apostle Islands,” but still not of “utility for park operations.” Such a building should not be removed or allowed to molder, but should instead be part of active restoration and maintenance efforts.

We agree with the concern noted on page 205 over inadequate docking space. An Island park should provide sufficient space for all forms of boating activity. This is not only an access and recreation issue, it also is a public safety issue due to the frequent severe storms on Lake Superior and handicapped access. Improvements are needed to docks, including repair and replacement of facilities lost in recent years.

The Conservancy would be pleased to meet with the Park Service to discuss the points raised in this letter, and we encourage the Service to undertake a broad-based consultation process with affected parties as it moves forward with the planning process.

The Conservancy looks forward to working with NPS for decades to come to fulfill the extraordinary promise of this wonderful park. Thank you for considering these comments.

Very truly yours,



Robert J. Nelson  
Chairman



11

**Public Employees for Environmental Responsibility**

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October 19, 2009

Mr. Robert Krumenaker  
Superintendent  
Apostle Islands National Lakeshore  
415 Bayfield Avenue  
Bayfield, WI 54814

Dear Superintendent Krumenaker:

Public Employees for Environmental Responsibility (PEER) commends the National Park Service (NPS) for a thorough and thoughtful Draft General Management Plan for the Apostle Islands National Lakeshore. The NPS deserves credit for also including a "Wilderness Management Plan" for the recently designated Gaylord Nelson wilderness.

PEER offers the following specific comments on the Draft Plan:

### **1. Alternatives**

PEER endorses Alternative 3 as the alternative that best serves to protect the integrity of the natural and cultural resources of the National Lakeshore over the long term.

Alternative 3 would manage the undeveloped parts of Basswood and Sand Islands as a primitive (though non-wilderness) zone. The NPS preferred alternative (Alternative 2) does not, instead designating these areas as "backcountry" only.

### **2. Current Life Estate Properties**

PEER endorses the NPS preferred alternative treatment of current life estate properties. Seven life estate properties continue to exist within the boundaries of the park. The United States acquired these properties and owns them in fee, while the former owners retained a right of occupancy and use for their lifetime. The Draft proposes to carry out the terms of the contracts that govern each of these seven properties, i.e. upon the expiration of any extant rights of use, the NPS will take full possession.

Some, but not all, of the properties contain structures that may be eligible for listing on the National Register of Historic Places. Those structures that the NPS determines not eligible should be removed unless they may serve some NPS administrative need, such as a patrol cabin. The removal of non-historic structures that serve no NPS administrative need will reduce future backlogs of maintenance needs.

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### 3. Bicycles On Trails

PEER supports the NPS decision to not consider designating any of the trails in the park, in particular the Lakeshore Trail in the Mainland Unit, as open for bicycles. (p. 153)

### 4. Wilderness

Most of our comments address some minor errors in the Draft Wilderness Management Plan. Our comments are not disagreements with the Draft over substance. Rather, PEER points to several significant inaccuracies in the Draft with regard to the legal authorities that govern wilderness.

#### a. Page 91

The Draft states that “American Indian access for sacred or religious purposes will be permitted in the wilderness consistent with the *regulations* and intent of the American Indian Religious Freedom Act, Executive Order 1307: “Indian Sacred Sites” of May 24, 1996, the Wilderness Act and related laws and policies.” (emphasis added)

There are no “regulations” promulgated by the United States in the Code of Federal Regulations that implement the American Indian Religious Freedom Act or the Executive Order on Sacred Sites. Nor does the NPS possess any regulations that implement the Wilderness Act. The Department of the Interior promulgated Department-wide regulations for wilderness at 43 CFR Part 19 but no section thereof addresses Indian access for religious purposes. Thus, the use of the word “regulations” in the above sentence is incorrect and should properly be deleted.

#### b. Pages 85 and 86

In an attempt to paraphrase the words of the Wilderness Act, the Draft made several errors, some very minor, others quite significant:

- The Draft states “The Wilderness Act also specifically prohibits certain uses and developments. Under section 4(d) of the Act, the following uses are not permitted in wilderness:” (emphasis added). The section of the Wilderness Act that contains the specific prohibitions is section 4(c), not section 4(d).
- The Draft states that section 4(d) prohibits “permanent improvements or human habitation”. Neither section 4(c) or 4(d) contains such a prohibition. That phrase is actually contained in section 1(c) of the Wilderness Act and is part of the “definition” of wilderness” not among the section 4(c) prohibitions. Practically, because of the prohibitions in section 4(c) permanent improvements or human habitation are not allowed in wilderness but section 4(c) does not itself contain such a phrase.
- The Draft states that section 4(d) does not allow “structures or installations (*excluding historic structures*)” (emphasis added). The Wilderness Act, section 4(c) or 4(d) does not contain a phrase “excluding historic structures”. For other reasons, historic structures found within a designated wilderness may be preserved. For example, section 2(c)(4) of the Wilderness Act acknowledges that a wilderness area may contain “features...of historical value”. But that provision is not found as a qualification to the section 4(c) prohibition on structures.

- The Draft states that section 4(d) prohibits the use of motor vehicles and motorized equipment and the landing of aircraft “*except for emergency purposes.*”(emphasis added). That is not quite accurate. Section 4(c) prohibits seven items “except as necessary to meet minimum requirements for administration of the area for the purpose of this Act (including measures required in emergency involving the health and safety of persons within the area)”. This exception applies to more than motor vehicles/motorized equipment and aircraft landing. And the exception is not limited to “emergency purposes”.
- The Draft states that section 4(d) prohibits “commercial enterprises (*except for commercial services that are necessary for realizing the recreational or other wilderness purposes of the area...*)” (emphasis added). Section 4(c) prohibits “commercial enterprise” period. The exception for certain recreational commercial services derives from section 5(d).
- The Draft states that “With the exception of permanent roads, the act does recognize that the above uses *may be permitted* if necessary to meet the minimum requirements for the administration of the area...” (emphasis as in original). This is incorrect. There are TWO prohibitions in section 4(c) that can never avail themselves of the “minimum requirement” exception. They are (1) permanent roads and (2) commercial enterprise. A careful reading of section 4(c) shows that only the prohibitions after these two are potentially subject to the minimum requirement exception. The section 5(d) exception for certain “commercial services” is not a minimum requirement exception but a “stand alone” statutory provision.

The NPS may chose to adopt our comments and correct these misstatements of the Wilderness Act found on pages 85 and 86. Or, the NPS may wish simply to repeat the plain language directly from the law to avoid such misstatements, misinterpretations or embellishments.

### **c. Grappling with Cultural Resources in Wilderness, pages 49**

The Draft acknowledges the difficulties raised by cultural resources within designated wilderness. Earlier, we pointed out that the Wilderness Act itself recognizes that designated wilderness may contain “features...of historical value.” In reconciling the sometimes-conflicting management imperatives, Apostle Islands need not “grapple” alone but seek guidance from the example of other parks or wilderness areas. Perhaps, one of the prime examples of historical features in designated national park system wilderness are the ancient cliff ruins in the Bandelier Wilderness of Bandelier National Monument, New Mexico. The designation of wilderness there did not lead the NPS to remove the ruins, nor to cease stabilizing them. Even though the cultural resources at Apostle Islands rise, neither in number or character, to the level of Bandelier’s ruins, nonetheless, Bandelier offers a good template for Apostle Islands. PEER expects that the NPS at Apostle Islands may continue to preserve cultural resources in wilderness.

Long ago, Department of the Interior officials recognized that some lands with historical features may be included within wilderness recommendations to Congress. For example,

in a letter to Senator Henry Jackson of June 10, 1974, the Office of the Secretary wrote the following:

“This section (section 2(c)(4) of the Wilderness Act) provides, in part, wilderness areas may contain “ecological, geological, or other features of scientific, educational, scenic or historical value”. We interpret this language to mean that structures of historical value need not be carved out of wilderness areas. A recommendation to include such a structure in wilderness would be based on two criteria: (1) the structure should only be a minor feature of the total wilderness proposal; and (2) the structure will remain in its historic state, without development.”

Letter of June 10, 1974 from Office of the Secretary of the Interior, Legislative Counsel, signed by Ken M. Brown

BUT, Apostle Island must also be alert to exercising its cultural resource preservation actions judiciously and with balance. For this we have two recent examples from other national park areas.

- Cumberland Island National Seashore, Georgia

In a decision of June 28, 2004, the Eleventh Circuit Court (Wilderness Watch and Public Employees For Environmental Responsibility v. Mainella.) opined:

“...we cannot agree with the Park Service that the preservation of historical structures furthers the goals of the Wilderness Act. The Park Service’s responsibilities for the historic preservation of Plum Orchard and the Settlement derive, not from the Wilderness Act, but rather from the National Historic Preservation Act (NHPA), 16 U.S.C. 461, et seq. The NHPA requires agencies to assume “responsibility for the preservation of historic properties” they control. Id at 470h-2(a)(1)...”

“The agency’s obligations under the Wilderness Act are quite different. The Wilderness Act defines wilderness as “undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation.” 16 U.S.C. 1131(c). A wilderness should “generally appear[] to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable.” Id”

The Court continued:

“...the need to preserve historical structures may not be inferred from the Wilderness Act nor grafted onto its general purpose. Furthermore, any obligation the agency has under the NHPA to preserve these historical structures must be carried out so as to

preserve the “wilderness character” of the area. See 16 U.S.C. 1133(b) (“Each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area and shall so administer such area for such other purposes for which it may be established as also to preserve its wilderness character.”)”)

The court recognized that Congress imposes historical preservation responsibilities upon the NPS, but the court found that the NHPA (the only historic resources statutory responsibility considered in this decision) does not overrule the Wilderness Act prohibitions.

This decision helps lead the NPS towards the intelligent balancing of a variety of public mandates. While some may argue that the NHPA trumps the Wilderness Act, there is no support for that in court. The Eleventh Circuit found that while the NHPA applies to historic sites within wilderness, the NHPA does not repeal, overrule or grant an exception to the Wilderness Act mandate that the NPS manage wilderness to preserve wilderness character. The NPS did not appeal the Eleventh Circuit decision to the Supreme Court.

#### Olympic National Park, Washington

In November 2004 Olympic Park Associates, public citizens dedicated to conservation on the Olympic Peninsula, joined by Wilderness Watch and Public Employees For Environmental Responsibility (PEER) filed a complaint in Federal court against the NPS for violation of the Wilderness Act. (Olympic Park Associates v. Mainella). The Wilderness Act, prohibits, among other things, “landing of aircraft...and structure(s) or installation(s)... except as necessary to meet minimum requirements for the purpose of administration of the area (including measures required in emergencies involving the health and safety of persons within the area)” 16 U.S.C. 1133(c).

The NPS wished to replace two collapsed historic trailside shelters in the park wilderness with new structures. The NPS argued that:

1. the collapsed structures were historic properties, eligible for listing on the National Register of Historic Places;
2. the new structures, to replace the old, served “to maintain the historic feeling and appearance of the park trail system” and
3. the decision to restore “historic feeling and appearance” within park wilderness arises from a general statutory mandate(s) superior to the explicit proscriptions of the Wilderness Act.

On July 29, 2005, the U.S. District Court in Tacoma, Washington rejected the NPS arguments and found that the NPS proposal to place new structures in wilderness and deliver them by air violated two specific prohibitions of the Wilderness Act. (Note that this case is not about “historic” structures. This case involved non-historic “structures”. The Wilderness Act specifically prohibits structures, except as necessary for administration of the area.) The case is made more useful because the NPS did not

muddy the issue by arguing that the new structures were “historic” nor did not avail itself of the argument that the structures were needed for “health and safety”.

The Olympic case answered whether the NPS could install non-historic structures, not justified by administrative necessity (health and safety), but rather for the purpose of recreating the “historic feeling and appearance” of a location within designated wilderness; in other words - a “cultural landscape”.

The Court determined that the NPS could not legally place the new structures in wilderness “for the purposes of cultural resource protection”. The judge said that “[O]nce the Olympic Wilderness was designated, a different perspective on the land is required. With regard to the Olympic Wilderness, that perspective means “lands retaining its primitive character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions”.

The judge continued: “[I]f the reconstructed shelters were placed in the Olympic Wilderness, regardless of whether they were placed in the locations of the former shelters, the National Park Service would not be administering the area in accordance with its mandate under the Wilderness Act:

[E]ach agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area and **shall so administer such area for other purposes for which it may have been established as also to preserve its wilderness character.**” Emphasis as in original.

The NPS argued that other purposes of Olympic National Park, from the general mandates of the National Historic Preservation Act (NHPA), the Historic Sites Act of 1935 and ultimately the Organic Act of 1916, overruled the explicit proscriptions of the Wilderness Act. The judge, citing long-established court decisions, found no requirement in the NHPA that the NPS reconstruct anything, let alone the two shelters. More importantly, the judge disposed of the NPS argument that the NPS Organic Act mandate “to conserve historic objects” trumps the Wilderness Act prohibitions.

The judge wrote:

“The Organic Act cannot be interpreted to require replacement of collapsed shelters with new reconstructions to be placed in wilderness by helicopter where the Wilderness Act is a specific, protective statute militating against such intrusions. The Wilderness Act provides that an agency utilizing its authority under other laws in ways that affect wilderness must do so pursuant to the requirements of the Wilderness Act as a whole...A long established rule of statutory construction is that where there is a specific provision that governs an issue, it takes superiority over

any general provision. Here, the Wilderness Act under which the Olympic Wilderness was designated, is the specific provision, while the National Historic Preservation Act, among others earlier mentioned, is the general. The rule allows the NPS to administer the Olympic Wilderness for other purposes only insofar as to also preserve its wilderness character.”

The court found the NPS managers committed a “clear error in judgment”. The NPS error was the decision to place structures in wilderness, aimed at recreating the historic feeling and appearance of the place, without regard to whether that aim was valid under the terms of the Wilderness Act. At Olympic, the NPS failed to judiciously weigh the *variety of public mandates designed to protect diverse and valuable resources*. The NPS did not appeal the district court decision.

If the advice we offer Apostle Islands were PEER’s, it would be ONLY our opinion. The NPS could dismiss it. But, two recent court cases – the only such cases involving parks – examined this issue. The NPS must give considerable weight to the courts’ conclusions about how to mesh wilderness with cultural resources. Apostle Islands National Lakeshore lies neither in western Washington State, nor in the area covered by the Eleventh Circuit Court in Atlanta. But, the NPS would be wise at Apostle Islands to consider the court cases that illuminate the NPS responsibilities for cultural resources in wilderness. In short, the NPS must refrain from going too far, in particular in creating or restoring so-called “cultural landscapes”, within designated wilderness.

#### **d. Access by Indians in Wilderness – Page 91**

Other than assuring that Indians with reserved off-reservation treaty rights to hunt, fish and gather shall have access both to Apostle Islands and the Gaylord Nelson Wilderness within it, the Draft makes no mention of means of access in wilderness. Perhaps it is a total non-issue, and thus not mentioned. Perhaps it is an oversight.

There is another case, this from the Eighth Circuit Court of Appeals, the circuit in which Wisconsin and Apostle Island lies, that also offers insight. In 2001, the United States Supreme Court denied a hearing to an August 2000 Circuit Court decision (U.S.A. v. Gotchnik) about several Chippewa Indians in Minnesota who accessed designated wilderness in motorboats. They did so for the purpose of exercising their reserved rights to hunt, fish and gather on lands ceded to the United States by the Chippewa in a Treaty of September 30, 1854. The Eighth Circuit found that the reservation of use rights on the ceded lands that are now wilderness DID NOT include the right to use means of access that the Wilderness Act prohibits. Thus, when in the pursuit of game or plants on the wilderness islands of the National Lakeshore, Indians with reserved rights to hunt and gather on such lands may not use snowmobiles, ATVs or other prohibited means of access. Apostle Islands management needs to be aware of this principle in the eventuality that this question may arise.

**e. Accessibility for the Disabled – Page 91**

The Draft states “Title V section 508(c) of the Americans with Disabilities Act specifies that, in federally designated wilderness, a person who has a mobility impairment may use a wheelchair or *mobility device*...” (emphasis added). PEER cannot find the term “mobility device” in the cited portion of the ADA. Nor does the Draft define the term. In any case, whether defined or not, the ADA does not provide for “mobility devices.” The ADA states that “Congress reaffirms that nothing in the Wilderness Act is to be construed as prohibiting the use of a wheelchair in a wilderness area by an individual whose disability requires use of a wheelchair...” The ADA further defines “wheelchair” as “...a device designed solely for use by a mobility-impaired person for locomotion, that is suitable for use in an indoor pedestrian area.”

The addition of the term “mobility device” in the Draft appears to be an embellishment that is both unclear and not grounded in the law. Please remove it.

**f. Management of Cultural Resources – Page 90**

The Draft states that “...many actions affecting cultural resources in the wilderness area will only be undertaken after appropriate consultations with the Wisconsin state historic preservation office, *associated American Indian tribal historic preservation offices*...” (emphasis added).

Our limited knowledge of the National Historic Protection Act (NHPA) shows that Section 101(d)(2) prescribes that tribes may assume the role of the state historic preservation office (SHPO) only for “tribal lands”. The NHPA, Section 301, defines “tribal lands” to include “all lands within exterior boundaries of any Indian reservation; and all dependent communities”. Thus, under the NHPA, a Federal agency must “consult” with the Tribal Preservation Officers (TPO) for “undertakings” that affect historic properties on tribal lands, where the tribe has assumed the authority formerly exercised by the SHPO.

The wilderness islands of the Gaylord Nelson Wilderness are not “Tribal Lands” in the meaning of the NHPA. Please clarify why the NPS believes that the NPS must consult under NHPA section 106 with the TPO, for activities on parklands that are not tribal lands.

Thank you for considering these comments. PEER hopes they will result in a more accurate and clear Final Plan.

Cordially,  
  
Jeff Ruch  
Executive Director



September 28, 2009

Mr. Bob Krumenaker  
Apostle Islands National Lakeshore  
415 Washington Avenue  
Bayfield WI 54814

Dear Bob:

The Bayfield Chamber & Visitor Bureau board of directors is pleased to lend its support to the Preferred Alternative (2) as proposed in the Apostle Islands National Lakeshore Management Plan.

We are particularly pleased with the potential for increased visitor access to several of the islands and increased opportunities for Bayfield entrepreneurs. At the same time, we also support the continuation of the park's designated wilderness areas as well as the continued protection and maintenance of park resources.

The restoration of the light stations is important to area's historic interpretation and new non-wilderness trails and the expansion of Meyer's Beach facilities are very welcome as well.

We also support the concept of a modern visitors' center in downtown Bayfield and appreciate plans for continued use of the old courthouse for administrative offices. We anticipate that both the Chamber and the City will be included in further planning for these facilities.

Please note our concern that commercial and sport fisheries be given input and supported in future park management plans as they are important to our economy, our tourism industry, and visitor appreciation for the resources of the lake.

In summary, the Chamber supports the Park Service plans to expand visitor access, enjoyment and appreciation of the islands and such new business opportunities as may arise and we look forward to being an active partner in the ongoing planning process.

Sincerely,

A handwritten signature in cursive script, appearing to read "Art Ode".

Art Ode, President

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where the water  
meets the soul.

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October 23, 2009

Mr. Robert Krumenaker  
Superintendent  
Apostle Islands National Lakeshore  
415 Bayfield Ave.  
Bayfield, WI 54814

Dear Superintendent Krumenaker:

Wilderness Watch is providing the following comments on the Draft General Management Plan for Apostle Islands National Seashore (APIS). We appreciate the efforts of NPS staff that have gone into developing the plan.

Wilderness Watch is a national conservation organization with members throughout the country who have a deep and abiding interest in the protection and proper stewardship of the lands and waters in the National Wilderness Preservation System. We appreciate the Park's efforts to protect and perpetuate the wilderness character of the GNW. We believe, however, that the plan needs to be strengthened in this regard.

As a general point, we have reviewed the comments of Public Employees For Environmental Responsibility (PEER) and wish to endorse those comments in most respects. We wish to raise a couple of additional concerns with regard to the plan's treatment of cultural resources and the use of generally prohibited activities (i.e. motorized equipment, motor vehicles, etc.).

**Cultural resources:** The APIS contains a wealth of both cultural/historic resources and Wilderness. With respect to that portion of the APIS that is designated as Wilderness, both cultural resources and Wilderness can be preserved provided it is done in a manner that is consistent with all relevant laws. In short, that means in a manner that preserves the area's wilderness character.

The Wilderness Act defines Wilderness in part as "...an area of undeveloped federal land retaining its primeval character and influence, without permanent improvements...." It mandates that Wilderness shall be managed "for such other purposes for which it may have been established as also to preserve its wilderness character." The Act achieves this goal in part by prohibiting certain uses or activities, "...except as necessary to meet minimum requirements for the administration of the area for the purpose of the Act...there shall be no temporary road, no use of motor vehicles,

motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such areas.”

The GMP appears to treat cultural resources in the Wilderness as though they are exempt from the general prohibition on structures, or from the mandate to preserve wilderness character (we have related concerns with respect to the treatment of “cultural landscapes,” however we feel this issue is adequately addressed in PEER’s comments and will not belabor the point). Fidelity to the Wilderness Act appears to weigh solely on how the work gets done. For example, on page 90 the GMP states, “historic properties eligible for the [National Register] will be protected and maintained according to the pertinent laws and policies governing cultural resources. However, the *methods* used...must be consistent with the preservation of wilderness character.” (italics added). In fact, both the underlying question of maintaining (or rebuilding/ reconstructing) a structure in Wilderness and the method for doing so must preserve the area’s wilderness character and be consistent with the prohibitions in sections 4(c) of the Wilderness Act.

Two recent court opinions are relevant on this point. In Olympic Park Associates v. Mainella, the superintendent of Olympic National Park approved replacing two collapsed, historic trailside shelters with two new shelters in the Olympic Wilderness. The proposal included the use of a helicopter to airlift the new shelters into the Wilderness. The Court struck down the plan because the man-made structures themselves are contrary to the law and noted:

“While the former structures may have been found to have met the requirements for historic preservation, that conclusion is one that is applied to a man-made shelter in the context of the history of their original construction and use in the Olympic National Park. Once the Olympic Wilderness was designated, a different perspective on the land is required. Regarding the Olympic Wilderness, that perspective means ‘land retaining its primitive character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions.’”

Even if the Park Service has proposed to transport the structures to site by pack animal rather than helicopter, the legal outcome would have been the same.

In a separate case involving the Emigrant Wilderness (High Sierra Hikers Assn., v. U.S.F.S.), the Forest Service proposed to maintain several small, historic dams (some deemed eligible for listing) in the Emigrant Wilderness. All work was to be done using traditional skills. No motors or mechanized tools involved. Here again, the Court struck down the plan because the purpose—maintaining structures that are not the minimum necessary to protect the Wilderness—violated the Wilderness Act.

“[T]he text of the Wilderness Act provides no indication that Congress intended to exempt existing dams in wilderness areas from the general prohibition against “structures” or “installations.” The court must conclude the plain and unambiguous text of the Wilderness Act speaks directly to the activity at issue in this case – repairing, maintaining and operating dam “structures” – and prohibits that activity....Based on the foregoing, the court concludes the proposed actions in this case – the repair, maintenance and operation of the

dam structures – are clearly and unambiguously contrary to the provisions of the Wilderness Act....

Absent a declaration by Congress of the need to restore and preserve the dam structures in recognition of their historical significance, there is nothing the court can point to that would authorize such an action where the maintenance of the dams would otherwise come into conflict with the Wilderness Act. The area manifested its wilderness characteristics before the dams were in place and would lose nothing in the way of wilderness values were the dams not present....

The Wilderness Act’s prohibition against structures is categorical so far as the court can determine, allowing only those exceptions that are specifically set forth in the Act or in Congress’s designation of a particular wilderness area, neither of which apply here.”

It was not the method of repairing and maintaining the dams that the court found contrary to Wilderness, but the effort to perpetuate the structures in Wilderness that offended the law. Without further belaboring the point, we think the GMP needs to be changed to reflect that the treatment of cultural resources is a different matter inside the Gaylord Nelson Wilderness than it is in the rest of the APIS. The test is not whether the structures are historic, but rather whether they are necessary to meet minimum requirements to protect the area’s wilderness character.

### **Motorized Equipment / Mechanized Transport**

The Desired Conditions section of the plan states: Administrative use of motorized equipment or mechanical transport will be authorized only if the superintendent determines it is the minimum requirement needed to achieve the *purposes of the area as wilderness...*” (italics added). This is an inappropriately liberal allowance for the use of motorized equipment in Wilderness.

The Wilderness Act prohibits the use of motorized equipment and mechanical transport “except as necessary to meet minimum requirements for the administration of the area for the purpose of the Act.” The purpose of the Act is to preserve the area’s wilderness character. Thus the test for the use of motorized or mechanized equipment is whether its use is *necessary to meet minimum requirements to protect the Wilderness*.

The purposes of Wilderness, described in section 4(b) of the Act, are a variety of appropriate uses of an area such as for recreation, education, scientific research, etc.. These uses or purposes, however, are not the very limited singular purpose (preserving wilderness) to which the exception in section 4(c) applies. Wilderness Watch suggests that the statement in the GMP be changed to more accurately reflect the safeguards in the law, for example, “Administrative use of motorized equipment or mechanical transport will be authorized only if the superintendent determines it is necessary to meet the minimum requirement needed to achieve the *purpose of protecting wilderness character...*” Alternatively, the plan could simply mimic the language in section 4(c) of the Wilderness Act.

We appreciate the opportunity to provide our comments on the GMP and Wilderness Management Plan. I'd be happy to discuss any of these comments or concerns with you or your staff.

Sincerely,

A handwritten signature in black ink, appearing to read "George Nickas". The signature is fluid and cursive, with a large initial "G" and a stylized "N".

George Nickas  
Executive Director



Jim Nepstad/APIS/NPS  
11/09/2009 07:01 AM

To :Greg Jarvis/DENVER/NPS@NPS  
cc  
bcc  
Subject Fw: Comments - Draft Management Plan

----- Forwarded by Jim Nepstad/APIS/NPS on 11/09/2009 08:01 AM -----



"Town of Bayfield - Dave  
Good - Clerk"  
<ttown005@centurytel.net>  
10/23/2009 01:07 PM

Please respond to  
<ttown005@centurytel.net>

To "Jim Nepstad" <Jim\_Nepstad@nps.gov>  
cc "Town of Russell" <townofrussell@centurytel.net>  
Subject Comments - Draft Management Plan

Jim, I also submitted these comments electronically.

## Town of Russell

35900 State Highway 13  
Bayfield, Wisconsin 54814  
(715) 779-5338

E-mail townofrussell@centurytel.net

Paul Tribovich  
Chair

Dave Good  
Clerk/Treasurer

October 13, 2009

Gregory Jarvis  
National Park Service - Denver Service Center  
P.O. Box 25257  
Denver, CO 80225

Dear Mr. Jarvis:

These comments on the draft General Management Plan for the Apostle Islands National Lakeshore are submitted by the Town of Russell.

The Town has a strong interest in the draft Plan. It owns 60+ acres of land within the Lakeshore boundaries, and the common interests between the Town and the Park Service are addressed through an MOU. The Town operates a very popular campground at Little Sand Bay, as well as a public dock, roads and driveways that are used for public and park Service access, and backcountry roads and trails elsewhere within the mainland unit of the Park. In addition to these lands and facilities within the Lakeshore, the Town owns and maintains the sole access road to Little Sand Bay. Finally, many Town residents make frequent use of the Lakeshore for many different purposes.

As a result of its many relationships with the Lakeshore, the Town has a strong interest in the future of the park. The Town's and the Park Service's interests are closely related. Considering this connection, we are disappointed that the Park Service has done nothing to include the Town in the planning process. Instead, the Park Service has prepared this Plan without seeking input from the Town beyond general public comment. We believe that the Park Service is required to include the Town as a cooperating party in the preparation of the Plan. We request that the Park Service address this problem in preparing the final Plan by respecting the Town's expertise and control over areas and activities that are integral to the management of the Lakeshore. We also recommend that other local governments and Tribes be given the same status.

The Town sees a strong need for such involvement because the draft Plan calls for major changes that will have negative effects on the interests of our residents and our government operations. Although the Park Service has stated that it does not intend to  
Greg Jarvis

October 13, 2009

Page 2

make changes in the way the Lakeshore is managed because people like it the way it is, that is not the case for the areas of greatest interest to the Town. We agree with the statement that no major changes should be made, and request that the Final Plan meet that result.

The option that will best serve the interests of the Town and the public at Little Sand Bay is the **No Action** alternative because it retains the current level of Park Service involvement and support by maintaining the existing visitor center. The other options call for removing the visitor center and replacing it with inadequate facilities. Alternative 2 would scale back to only a contact station, Alternative 3 would use only a kiosk, and Alternative 4 would use only a contact station. It is obvious that the Park Service plans to reject the No Action alternative, and in doing so it would dismiss the only option that makes sense for Little Sand Bay - maintaining a full visitor center. Given the high level of public use in Little Sand Bay, it is contrary to the best interests of the public to scale back the visitor services at that location. The final Plan should commit to at least the same level of visitor service at Little Sand Bay that now exists.

There are other problems at Little Sand Bay that should be addressed. The ability of the Park Service dock to provide adequate access and sufficient boat usage has declined in recent years because of the failure to replace the finger piers destroyed by ice when they were left in place by the Park Service over the 2007-2008 winter. There also has been inadequate dredging of the harbor. While the Plan speaks generally about improving public access and use, the reality is that deteriorating facilities are having the opposite effect. The Plan does not explain how this problem will be solved.

The Plan fails to say anything about restoring the John Nelson cabin on the road entering Little Sand Bay. This historic building is in serious decline, and nothing is being done to repair it and

make it accessible to the public. The final Plan should call for restoring this building and making use of tools like historic leases for the Town or others to take care of buildings like this.

The primary reason offered for the decline in facilities and the need to remove the Little Sand Bay visitor center is insufficient funding. If this is the case, how can the Plan call for such ambitious plans as building a new visitor center in Bayfield and new visitor facilities at Meyers Road to serve kayakers? The Park Service has never had the necessary money, yet the preferred alternative and Alternatives 3 and 4, describe spending plans that are clearly out of reach under the current budget problems we hear so much about.

The final Plan should be more realistic and honest and not suggest that major changes in visitor services will occur and that historic properties will be adequately taken care of by Park Service staff. In addition, the Park Service needs to acknowledge that it will make Greg Jarvis

October 13, 2009

Page 3

greater use of cooperative relationships with local governments, the Tribes, and the public.

Thank you for considering these comments. The Town looks forward to sharing management and planning actions with the Park Service in the years to come.

Very truly yours,



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

cc: David Obey – U.S. House of Representatives  
Herb Kohl – U.S. Senate  
Russ Feingold – U.S. Senate  
James Doyle – Governor  
Bob Jauch – State Senator  
Gary Sherman – State Representative

September 30, 2009

Bob Krumenaker  
 Superintendent  
 Apostle Islands National Lakeshore  
 415 Washington Ave.  
 Bayfield, WI 54814

**NATIONAL  
 TRUST  
 FOR  
 HISTORIC  
 PRESERVATION  
 Wisconsin Field  
 OFFICE**

Dear Mr. Krumenaker,

The Wisconsin Field Office of the National Trust for Historic Preservation appreciates the opportunity offered by the National Park Service to comment on the Draft General Management Plan for Apostle Islands National Lakeshore. After review of this document, the National Trust for Historic Preservation agrees with Alternative 2, the National Park Service preferred alternative to guide future efforts of this site.

The quote by William Cronon referenced in the document, "the Apostle Islands allows visitors to experience a superb example of a wilderness in which natural and human histories are intimately intermingled" comments on the careful balance of natural and cultural elements this management plan addresses. These "human histories" are best told through the use of existing historic structures, landscapes, and sites contained on the Islands. All efforts to preserve this history are encouraged and applauded. As the document notes with Alternative 2, environmental consequences will be minimal while encouraging the visitor experience further through increased historic preservation efforts.

#### Importance of Preservation Planning Documents

It is also encouraging that there will be a continued focus on the importance of preservation planning documents to guide future preservation efforts. The importance of Historic Structures Reports, Cultural Landscape Reports, and similar planning documents are critical components for any historic preservation project. For both "the largest and finest single collection of lighthouses in the country" contained on the Islands, but also for additional cultural resources such as farmsteads, quarries, fish camps, logging camps, and additional resources should these planning documents also be considered. As page 35 of the General Management Plan notes; "Although a cultural landscape inventory has not been completed for Apostle Islands National Lakeshore, the cultural landscapes of the light stations remain remarkably intact." It was also encouraging to see on page 47 that "historic life estate properties West Bay Club and Camp Stella" will need to have these preservation planning documents completed in the future. With the generous support of the Jeffris Family Foundation, grants through the National Trust for Historic Preservation

#### **Wisconsin Field Office**

516 Algoma Boulevard #312  
 Oshkosh, WI 54901  
 P 920.233.0995  
 F 920.233.0995  
 E trent\_margrif@nthp.org  
 www.PreservationNation.org

#### **National Office**

1785 Massachusetts Avenue, NW  
 Washington, DC 20036  
 P 202.588.6000  
 F 202.588.6038  
 E info@nthp.org  
 www.PreservationNation.org

have funded 50% of the cost of these types of preservation planning documents throughout the state of Wisconsin. We have developed a substantial Request for Proposals process, list of qualified consultants, and other tools and resources that are available to assist the Apostle Islands National Lakeshore in the implementation of these planning documents as requested.

### **Sustainability**

The commitment to sustainable practices in the park is commendable and seeking LEED certification on any new facilities built, however, also keep in mind that the “greenest building is the one already built” and adaptive reuse of existing structures should be considered first before new construction. New visitor centers, such as a potential one in Bayfield closer to the water, or interpretive displays in existing structures can lessen the carbon footprint more than comparable new construction to achieve these purposes.

### **Creative Approaches**

The consideration for rehabilitation of additional historic properties for overnight use is also encouraging. Adaptive reuse of specific historic properties for this or other purposes should also be explored further. This can allow for the preservation of these structures and is preferred to the treatment of moldering or moth-balling of these resources. A resident curatorship program, such as the one used by the State of Maryland or similar creative alternatives should be strongly considered. Effectively engaging and utilizing the interest and capacity of local non profit organizations also is essential to this cause. A number of experiments are being conducted in other National Park Service sites that offer hope for languishing historic structures, such as the long-term leasing programs being developed to preserve historic farmsteads at Cuyahoga National Recreation Area in Ohio and 19th century military facilities at Gateway National Recreation Area in New Jersey. Public-private partnerships must be part of any strategy to protect historic resources in our parks, including at Apostle Islands National Lakeshore. Page 120, specifically mentions the adaptive reuse of a lighthouse for overnight public lodging to help offset the cost of rehabilitation, and would only be considered if the private sector would pay the entire cost for this conversion and if public access to the light is maintained. Page 152, notes that the planning team dismissed adaptively reusing Rocky Island fish camp cabins for public lodging, but did encourage the possibility of similar efforts for properties on Sand Island. There must be continued discussions on this topic of partnerships and adaptive reuse, and the National Trust for Historic Preservation offers its support and resources in this regard.

### **Finances**

The National Park Service estimates that there is a backlog of more than \$1.2 billion needed to rehabilitate the historic structures in our National Parks. The need for repair and maintenance has reached crisis levels at many. The one time cost of 27.7 million for Alternative 2 identified in this General Management Plan is preferred, any alternative that cuts maintenance to the historic resources of the Apostle Islands National Lakeshore is unacceptable. Moldering of historic properties allows for limited and more costly options in the future, and makes for limited public access.

The National park Service preserves unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations. The Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world. Alternative 2 follows this mission and is supported by the National Trust for Historic Preservation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Trent Elwyn Margrif', written in a cursive style.

Trent Elwyn Margrif  
Director  
Wisconsin Field Office  
National Trust for Historic Preservation



## National Parks Conservation Association®

*Protecting Our National Parks for Future Generations®*

Midwest Regional  
Office  
8 S. Michigan Ave  
Suite 2900  
Chicago, IL 60603  
312.263.0111  
312.263.0140 (fax)

October 23, 2009

Superintendent Bob Krumenaker  
Apostle Islands National Lakeshore  
415 Washington Ave.  
Bayfield, WI 54814

On behalf of the National Parks Conservation Association (NPCA), we appreciate the opportunity to comment on the Final Draft of the APIS GMP/Wilderness Management Plan and EIS. Since 1919, NPCA has been the leading voice of the American people in protecting and enhancing our National Park System, working together with our 340,000 members to preserve our nation's natural, historical and cultural heritage for our children and grandchildren.

NPCA has a longstanding interest in issues involving management of park in-holdings, improved visitor experience, and stewardship in the Great Lakes region, and we are particularly interested in a successful outcome to this planning process.

NPCA staff attended a public meeting for the GMP in September, speaking with park visitors about proposed changes. In addition, NPCA made contact with community leaders to gain better insight on how some of the proposed changes would affect visitors and the surrounding community. We commend the park service for taking a thoughtful approach to providing sound vision and management at the park and we are generally supportive of Alternative two, the preferred.

### **Mainland visitor center:**

The park is located in the tourist destination town of Bayfield, but because a vast majority of the park is located off-shore, there is little visibility for APIS or the park service in town. The current mainland visitor center is located "off the beaten path" where tourists are unlikely to find it unless specifically directed there.

NPCA strongly supports a new, centrally-located visitor center as it would draw far more visitors than the current center. A new facility located on the waterfront would benefit the park and the community, serving as a catalyst for new downtown development. A higher-profile visitor center would improve park visitation and introduce new people to a national park experience. If willing sellers step forward, the park service should work with community leaders and potential partners to investigate a centrally-located visitor center in downtown Bayfield on the waterfront.

### **Stockton Island camp sites:**

The camp sites on Stockton Island, located along the shores of Lake Superior, provide beautiful views in a very private setting. These sites are clearly valued by those who use them. Because of repeated use, however, the camp sites are causing shoreline erosion and damage to island resources.

NPCA encourages park staff to approach changing location of these campsites with careful forethought and planning. The park should use this opportunity to educate visitors about the



**National Parks Conservation Association®**  
*Protecting Our National Parks for Future Generations®*

impact that humans have on park resources and teach “best practices” to campers, boaters, and visitors. In relocating the sites, the park should consider changing location of some but not all of the lakefront campsites if this can be done without further damaging park resources.

**Managing for climate change impacts:**

NPCA strongly encourages the park to include in its General Management plan management strategies for the inevitable impacts of climate change. Warming temperatures and declining lake levels in Lake Superior and the entire Great Lakes region make for challenging times ahead. For example, the cost of repairing and rebuilding docks and other park infrastructure because of a drop in lake levels already has a profound impact on the park’s operating budget and employee time allocation.

Accommodating for adaptation of native fish, wildlife and plant life to climate change is critical for all national parks. The park should increase its focus on invasive species removal, wetlands restoration, and improvements on connectivity and corridor areas.

**Park boundaries:**

The boundary of the park is currently not considered in this GMP but should be, although we understand that redefining the boundary of an ocean or marine park is a complex task.

Currently 85 percent of the water within the Apostle Islands is not included in the park, although if asked, most visitors would likely assume that it is. Many of the response calls that rangers make are in the waters that are currently not in the park’s jurisdiction; rangers are in effect patrolling vast adjacent areas in addition to the park.

Climate change is causing lake levels to drop. This drastic change in lake level was not anticipated when the boundary of the park was created. A variable boundary should be considered if a new boundary around the outer ring of islands that includes all waters between the islands and mainland is not feasible.

NPCA thanks the National Park Service for the chance to comment on this planning process. We request that the staff at APIS use this process as an opportunity to protect all park resources for the short and long term.

Sincerely,

Lynn McClure  
Midwest Regional Director

19 October, 2006

Mr. Greg Jarvis  
National Park Service  
Denver Service Center  
Apostle Islands National Lakeshore  
P.O. Box 25287  
Denver, CO 80225

Dear Mr. Jarvis:

I am writing today to comment on the draft General Management Plan for the Apostle Islands National Lakeshore.

As I wrote in a letter to you 3 years ago, I am one of the members of the Rice family, which has long-standing ties to the Apostle Islands. I have spent time on Sand Island every summer of my life and value the island and its history more than words can say. I grew up spending at least 2 months of the summer at the Point on Sand Island, a piece of property that was once the old Shaw farm and which was purchased by my great-grandfather, Fred Andersen, in 1944. The adjacent Andersen property to the west was once Lieutenant Governor (WI) Fifield's Camp Stella and which in turn had been purchased by Mr. Andersen in 1933 from Daisy Jensch, the daughter of Sam Campbell (the region's former Indian Agent and one of Sand Island's earliest residents.) My mother, Mary Rice, also has spent every summer of her life on Sand Island, and I would hope to offer the same opportunity to my children. You can appreciate, therefore, that ours is a lengthy history of summer residence in the Apostle Islands and the importance that the area holds for us.

First, I am pleased to see that the draft Plan places a strong emphasis on historic preservation and that the Park Service calls for the use of partnerships with other groups and volunteers to maintain historic properties. It is unrealistic for the Park staff to meet the historic preservation duty and it is also undesirable when the general community and historic use families like my own are willing and able to carry out that function for the properties to which we are tied. It makes the most sense for those families who represent the history of the properties to maintain them and help to tell the properties' stories.

It concerns me that NPS has suggested it can accommodate the preservation of the history on its own. I would like to see groups like the AIHPC encouraged to help, ensuring that the history and structures remain available for future visitors to the Park.

The idea to close the visitor center at Little Sand Bay is equally undesirable and underscores the NPS's ability to manage without partnership support. Transporting the historic artifacts to a faraway place for storage will not benefit anyone.

In addition, the preferred alternative intention to spend significant funds on a new visitor center seems highly irresponsible and a misuse of resources when existing structures are not being taken care of, e.g. the failure to replace the finger piers at Little Sand Bay, limiting access

by boaters. I would prefer that the Park protect existing structures before spending on future structures.

Lastly, within the General Management Plan for the Apostle Islands National Lakeshore it is noted several times that the success of the proposals will depend in part on the use of partners. This can provide opportunity to enter into arrangements with organizations like AIHPC and others. These relationships are, in my opinion, necessary for preserving and maintaining the Apostle Island's rich history. Many similar approaches have been used in other national parks for the same purpose, and the strong commitment of community and historic use families like mine point to the ideal circumstances for such a partnership at the Lakeshore.

Thank you for your time and consideration. Please include these comments in the record for this planning process, and keep the community informed as to the direction of your planning and decision-making as this process moves forward.

Sincerely,  
Katherine Hayes

October 23, 2009

James Edwards  
720 Washington Avenue  
Bayfield, Wisconsin 54814

National Park Service  
Denver Service Center  
Attn. Greg Jarvis  
P.O. Box 25287  
Denver, CO 80225

**RECEIVED**

**OCT 26 2009**

**DSC-P**

Dear Mr. Jarvis,

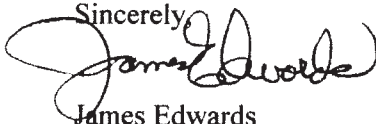
The Edwards family has long and strong ties to both South Twin and Rocky Island through my grandfather Olaf Edwards that go back to the 1910 era. My grandfather sold property to Julian Nelson at Rocky Island in 1947. I have been associated with Rocky Island since my childhood. I am also a retired high school history teacher who believes strongly in K-12 education and the maintenance and restoration of historical sites, districts, lighthouses, and amenities in the Apostles.

I read on page 92 that education and interpretation will not be allowed in the Gaylord Nelson Wilderness. Please give advice to why not? Natural history, local history and environmental sciences are an important component to the education of young adults. Where in the world do educational activities in a wilderness pose a threat? Education befriends the wilderness? Was public input from educators from the Bayfield School District at least at the beginning of the planning sought?

Our family and many old Bayfield families have donated many old family photos and artifacts to the park for the purpose of future historian use. All are in safe keeping for public access, our school children and future historians in the Bayfield's Historic Courthouse and at the Little Sand Bay visitor center sites. Now the word is that the Regional Office of the park has by decree determined our private donations will be placed in the Keweenaw National Park vaults, and for all practical purposes hidden away forever. Was the public ever consulted?

As noted I do have some grave concerns with the park's draft GMP as it is proposed and as such I am strongly opposed to the parks preferred plan #2. Community input is important- I did not find outreach in the draft GMP- too bad. Additionally plan #2 is too expensive and the park must focus on providing education, maintaining and repair, versus the empire building presented in option two. Start to expand working partnerships with the locals who care as much about the future of the park, as the park. Option #1, while weak at best, status-quo, is the only option of merit.

Sincerely,



James Edwards

October 21, 2009

**RECEIVED**

**OCT 26 2009**

**DSC-P**

Mr. Greg Jarvis  
Apostle Islands National Lakeshore  
General Management Plan  
National Park Service  
Denver Service Center  
P.O. Box 25287  
Denver, CO 80225

Dear Mr. Jarvis,

I am writing to comment on the General Management Plan for the Apostle Islands National Lakeshore.

My biggest concern is with the maintenance of existing buildings in the park. Many of them are deteriorating, and the history of the Lakeshore is being lost. None of the buildings that are important to the history of the park should be lost or allowed to decline.

I also urge the Park Service to work together with the local community, especially those people who have a long association with the Islands. I support the Apostle Islands Historic Preservation Conservancy in this effort. Those families and individuals who still maintain historic buildings should be allowed to continue in that role if they are willing to do so. They are part of the history.

I do not favor any alternative that calls for constructing new facilities until the existing buildings are restored and maintained.

I also ask that the final Plan improve access for boaters, including improvements at existing docks.

Thank you for considering these comments.

Sincerely,



John Westphal  
W 5850 Old 182 Road  
Park Falls, WI 54552

MARILYN and HUGH MADSON  
P.O. Box 853  
Lake Elmo MN 55042-0453  
651-275-3430  
FAX 651-770-6024

October 21, 2009

Mr. Greg Jarvis  
National Park Service  
Denver Service Center  
PO Box 25257  
Denver, CO 80225

RE: Apostle Islands National Lakeshore General Management Plan

Dear Mr. Jarvis:

The purpose of my letter is to respond to some of my concerns relative to the General Management Plan. My first visit to the Apostle Islands was to go to Sand Island with my family in 1939.

There have been many changes to the Apostle Islands region over my past 70 years. Historic preservation of existing building is important to me. It is important for the Park Service to maintain the remaining buildings instead of planning to spend funds on new facilities such as a new harbor or visitor centers. I am familiar with the current harbor and the old Court House in Bayfield. These facilities are all the Park Service needs now and in the future. Additional funds, if available, should be used to preserve the lighthouses and other building. This is the current responsibility of the Park Service.

I have visited other parks where there is great use of partnerships with organizations and business in the area of the parks. Much has been accomplished through these partnerships. This is not the case for the Apostle Islands. Current management discourages partnerships. This should be a high priority.

There are many life time leases on properties that have historic significant value to the region. I believe it is the interest of the Park to allow those leaseholders to continue to live and maintain this property. This can be done in a way that allows the public to visit the property and at the same time the property is occupied by someone who will serve the needs of the public and the Park.

Why move historic artifacts from the region? That does not make any sense. Why remove or not maintain docks at little Sand Bay or on some of the Islands? Again, that is not serving the boating public.

These are just a few of my concerns. Thank you for your consideration.

Sincerely,



Hugh Madson



Jim Nepstad/APIS/NPS  
11/09/2009 07:02 AM

To :Greg Jarvis/DENVER/NPS@NPS  
cc  
bcc  
Subject Fw: GMP Feedback

— Forwarded by Jim Nepstad/APIS/NPS on 11/09/2009 08:01 AM —



Cindy McDonnell  
<csmdon@gmail.com>  
10/23/2009 03:26 PM

To jim nepstad <Jim\_Nepstad@nps.gov>  
cc peg dollinger <pegdollinger@centurytel.net>, Rex dollinger  
<rexdoll@centurytel.net>, Ed Batton  
<edbatton@bayfieldconsulting.com>, bmcDonnell@watlow.com, Erik Scott  
<erik.scott1@gmail.com>, pcscott1 <pcscott1@gmail.com>, jack culley <jrculley@sailboats-inc.com>, Lynda Culley  
<lyndaculley@sailboats-inc.com>  
Subject GMP Feedback

Hi Jim - hope you are doing well. I know, I still owe you my dock count doc -- I've been strapped with some commitments that have prevented me from spending the time on this that I'd like. In fact, I just got my feedback in electronically for the GMP. I did not spend the time I'd intended to revise/reword but wanted to make the deadline so alas, here we are!.

I've attached the doc I sent so that you could see it in a somewhat better format than the web-site process affords. Please do not be offended by my comments - they are a little acerbic and I know this but I needed to make some clear points on what I and many other see is going on. After watching the PBS special on the National Parks -- America's Best Idea, it helped me feel more confident about what I wanted to say and why it's important.

I am happy that you are the acting superintendent for the AINL and have high hopes that if you were to continue on in this role, we'd see some action in the right direction with your understanding of some of the bigger picture items -- at least that's what my impressions are from our discussion a month ago.

If you have any feedback on what I wrote, I'd be open to your comments.

Thanks and good luck with this!  
Cindy McDonnell

[csmdon@gmail.com](mailto:csmdon@gmail.com)



Cindy McDonnell GMP Feedback Cindy McDonnell Oct 2009.doc

## Feedback to National Park Service re: Apostle Islands General Management Plan Proposal

Fall 2009

### Parks are for the People...

... not the Park Service. However, at the rate of "Preservation and Protection" going on in the Apostle Islands National Lakeshore, the only people who will have reasonable access and enjoyment of the park will be the rangers.

Don't get me wrong – I'm all for preserving the park for the enjoyment of future generations – it's just that "generations" are **people**. And when access is restricted year after year for the primary visitor groups to the islands (kayakers, boaters, campers, hikers, beachgoers) and the experience of being in the park is degraded, I wonder if the park administration realizes what "future generations" and "enjoyment" mean.

The purpose of the National Parks is not just for preservation and protection of our national parks (please see mission statement at end of this document). It is also for recreational use, inspiration, education, ..... for the visitors per Acts of Congress.

As for the AINL, one of the *least visited parks* in the country, it is apparent that the preservation/protect factor gets excessive emphasis to the detriment of the recreational/enjoyment/economic factor – and this is probably contributing to the huge decline in visitorship over the last 12 years. To be sure, these visitor deterring actions by the NPS are certainly not promoting visitorship to the islands. Let's face it, it's a tough park to get to. And the NPS should be doing things to counter this aspect and make the park more accessible – or let's quit funding it with taxes and let it go back to private ownership and WI State Park status.

Because of the ways financial resources are squandered on non-value-added spending (new Avalanche vehicle, windsled when park is virtually devoid of visitors, septic drainage fields for minimal gray water at ranger sites and exorbitant costs [\$140k each X 3?], admin salaries at the visitor center), visitor access enhancing projects such as dock/trail/campsite (DTC) maintenance are not occurring.

The AINL is gradually being preserved to the point that people don't care to visit the island like they used to as evidenced by the facts below.

Consider this:

- Island (vs. mainland or total) park visitorship has been on an overall decline and has declined 38% since 1997 per park statistics. Visitorship to the mainland is down 5% and total visitorship is down 10% for the same period. While the data collected for these figures are not 100% accurate, they are the best that we have to use and the trends are probably representative. *One could postulate that the economic impact to the local economy including restaurants, motels, shops, local marinas, kayak outfitters, tour operations would follow a similar trajectory.*
- The number of dock spaces (which allows for safer access/protected over-nighting and day-tripping for smaller boats, families, elderly, physically impaired) in the islands has decreased about 50% over the last 10 – 15 years due to lack of dock maintenance/dredging, NPS allocated dock spaces, removal of cleats on existing dockages

and removal of docks. Since this parks' main attraction is that it's a group of islands, one would logically expect it to have reasonable access to the islands via watercraft – and docks are basic to this for the majority of boaters wishing to land on the islands. Many people who live in the area (Bayfield, Washburn, Ashland) never get to visit the islands because Lake Superior can whip up a storm in a hurry and there is only one “sure bet” for a safe visit if you are in a “small” (less than 25') boat – that is Presque Isle.

- The hiking trails have overgrown to the point of being impassable on certain islands – and people have been at risk of getting lost. This is due to lack of trail maintenance. Visitors need something to do once they get to the islands (why come if there is nothing to do?) and hiking is a great way for visitors to experience the wilderness. Of all the trails in the islands, approximately 75% need major work to be safe, passable and enjoyable.
- The number of potable water sources is down to one in the islands – and it was four just eight years ago. I guess people can drink out of the lake if necessary but many would find this a potential health issue.
- *Kayak outfitters have had increasing demands put on them just to operate in the park – such as being required to pack out human waste. Why the kayaker visitor group is profiled in this matter is beyond me – don't they have a right to the same basic park services/rules as the rest of the visitors? Would you expect campers getting to the islands by private boat or tour boat to do the same? The NPS should recognize the kayakers as a growing visitor group and plan accordingly for their needs – or risk having more problems as a result. They should be delighted to have the outfitters as they require safety courses in order to rent from them thereby educating this visitor group. Nearly all (100%?) of the distressed kayaker rescues are for kayakers not going through the outfitters.*
- Some of the most beautiful and long-standing campsites in the islands at Stockton Island Presque Isle are in danger of being closed down. The same goes for the Oak Island sand-spit campsite. New sites would be established in a hard to access (1/4 mile walk with your gear), clustered setting, mosquito swamp, no views/no breeze/no small boat landing type settings. Boats would need to cluster at the docks on Presque Isle – and this is already a little clustered but offers the safest small harbor in the islands. This would have more of a KOA type feeling than a wilderness experience if you ask me. Bank stabilization and more cost efficient toileting options exist. The archaeological areas could be fenced off closing only a couple of sites and made into educational opportunities. The bears have not caused problems for years because of increased education and bear-proof food lockers according to the rangers at Stockton. See the special section on this below.

All these above facts (and many other issues) contribute to my (and countless others') conclusion that the NPS seems to be restricting access and enjoyment of the park -- despite what their erroneously designed and incomplete surveys and other documents will tell you. The superintendent continually falls back on the claim that their job #1 is to preserve and protect and they are constricted by funding – these are their trump cards when public feedback is given such as at the Bayfield meeting in August, 2009. They have not adequately researched alternatives to many of their “preferred plans” and are expecting the public to give them well thought out alternatives *in writing*.

We will not have full access to what these comments are from citizens so we will never know what these citizen suggested alternatives are and if the NPS even considered them. I would argue that it is the NPS's job to research alternatives and be aware of what other parks are doing to solve these problems – because other parks (state, local and national) that I've visited have solved similar issues.

## ***Specific GMP Feedback***

### **Presque Isle and Oak Island Campsites**

This is an interesting issue. For one thing, PI is one of the most beautiful places in the island, offers the best – and only – protected harbor in the islands that is still accessible by boats (docks are fairly well maintained – could use dredging), good anchorage with a safe alternative around the point, has good hiking, has Julian Bay beach and the bog, great camping, and day trip access from tour boats. On the other hand, if any place in the islands is every overpopulated, this would be the place. This park is effectively used 3 months of the year and because it is a grouping of islands, it's somewhat difficult to access because you need to get to the islands via watercraft. And the overpopulation only occurs on a couple weekends (July 4<sup>th</sup>, Labor Day?, a day or two in August). Now the NPS is saying overuse is contributing to some of the problems here and campsites will need to be closed.

If overuse is a problem in these islands, it's because the NPS has created the problem. By not adequately maintaining or providing for other docks/harbors (Devils, South Twin, Rocky), visitors are being quarantined to PI – and now the NPS is crying "overuse" of these beautiful campsites.

THIS PASSIVE Approach to Park Management (the "Do Nothing Approach" – let campsites, docks, harbors, trails degrade naturally due to lack of maintenance) seems like an active approach to discouraging visitors. **It GOES AGAINST A PRIME THRUST OF THE MISSION OF THE NATIONAL PARKS – ENJOYMENT AND RECREATION OF THE PEOPLE.** Each word (enjoyment, recreation, people) is useful here – and implies that one has the reasonable accessibility the park. After all, one must access the park to enjoy it – watching a video in the visitor center – or looking at a brochure doesn't quite do it for most people. I, along with the founding fathers of the National Parks in this country, believe that people of this country need to do more of this activity to get in touch with nature, learn to appreciate it and hopefully apply this appreciation to the greater world that needs to be cared for. Parks are for the people – all the people – not just the rich, intrepid and employees of the NPS.

I am opposed to the GMP alternative plan to move the current campsites at Presque Isle on Stockton Island out to the peninsula area for the following reasons:

- 1) The new sites will be **difficult to access**
  - a. Kayaks and small boats cannot land safely at the rocky shores on the peninsula – boats/kayaks will need to land far away from campsites making it more difficult to transport gear to the campsites. This will add to congestion at Presque Isle dock.
- 2) The new sites will be **unpleasant to inhabit** compared to the current campsites – this will likely **reduce visitorship to the Islands** by closing down one of the most highly desirable places to camp in the islands.
  - a. It gets hot and buggy back in the woods versus the current location which provides sufficient breezes
  - b. There are no views of the lake back in the woods versus the current location which offers some of the best vistas/best camping in the Apostle Islands
- 3) It is a **misuse of public funds to "move" these beautiful sites to an undesirable location** when there are alternatives to solving the current stated problems
  - a. Erosion problems are dubious – these campsites have been in place since before the Park was a National Park and little has changed at these campsites. Most of the erosion is from natural causes (wind,

- water, ice). What little erosion is caused by humans could be mitigated taken such as placing more ladders up the banks and educating people to take care of these sites.
- b. The bear problems are perhaps not really problems to the same extent as previous. The problems appear to be under control per ranger comments – camper education and bear boxes have helped keep the bears away. Only a few bear sightings in the area – and no major problems – have occurred for 4-5 years. Moving sites inland will likely have no impact on the bear problems anyway.
  - c. The vault toilet pumpout problem could be solved by converting to a different type of pit or composting toilet. Other parks use these types. The BWCA Wilderness uses pit toilets – and this is a “wilderness area”.
  - d. Archaeological value is dubious as well – there is probably evidence of humans in 1000s of places in the islands – why pick the PI campsites to focus efforts just because there is some firerock? Same with the Quarry Bay site that is closed already. This is rather a phony reason to close the campsites after all the NPS has done to burn/tear down more recently built structures that would have offered historical learning experiences of what life was like in these islands for the fishing/trapping/logging/mining inhabitants. Suggestion: Put up a sign at the campsite and educate people about what is known.

The same goes for closing the beautiful spit campsite at Oak which would force campers to the tent city near the dock which is already congested with kayaks, does not offer views or breezes or convenient beach access – and prohibits swimming near the dock.

**Bottom Line:**

- 1) **Don't go nuclear with closing the campsites at Presque Isle and the Oak Island Sand Spit – or it will once again look like, the NPS is doing what it can to discourage visitorship. Instead, shore up campsites that are most in need of repair, fix the toilet problem by switching to another type of toilet and make an educational opportunity with the one or two campsites at PI that have some sort of archaeological value. Continue with bear box program and education of campers to limit their impact.**
- 2) **Create a master plan to rehab and maintain the docks/harbors (over the next 10 years) to allow reasonable and safe access to the islands. Apply for federal funds to do this. We don't really need another lighthouse rehabbed that will consume \$5 million of fed funds. Nice to have but access to the islands would serve the visitors better and the Raspberry Light just ate up a lot of money.**
- 3) **Create a master plan to rehab the trails and continually maintain them. Reduce the admin costs and shift funds to trail maintenance. Use public volunteers to help with this.**
- 4) **Stop closing the premier campsites. Create more of these premier campsites so visitors can have a stellar experience in the parks. Using the Wilderness Area trump card falls flat as the BWCA has plenty of these stellar campsites – if they can do it, so should the AINL park.**
- 5) **I like the idea of providing a low cost option for people to access the close in islands on a daily basis via shuttle. This makes a lot of sense if more people could picnic/hike/swim/explore nature in the islands when they visit the AINL.**
- 6) **OVERALL: stop wasting money on stuff that does not add to the visitor access/enjoyment of the park and put more funds to projects that increase visitorship and enjoyment of the ISLANDS – this is where it's at – not a ¼ mile strip of land along the mainland or at the visitor centers. Sure, the mainland offers easy access for many people but the main attraction is the Apostle Islands – hence the name, Apostle Islands National Lakeshore. If the islands were more user-friendly, more people would be able to enjoy the park.**

I've been to many National Parks and most of them project a sense of "come and enjoy the park and here's how to do it." This is in opposition to what the AINL feeling is: "Get to the islands—that is IF you can (if you own a *large* enough boat or can paddle a kayak or can afford \$50/per person in your family to take a boat cruise to enjoy 3 hours on an island) – and hike at your own risk. We can't promise that what limited docks we have will be accessible for your boats – or offer much protection in case of a storm. We'll make it hard for you to camp and make you feel guilty for needing to use the toilets because they are such a problem for us to maintain – we can't even supply toilet paper and rely on people like you to fund this through the Friends of the Apostles."

Good luck on this. I think if you get some guiding principles for your efforts, this will become clearer. As it stands now, if you don't know where you are going, any road will be you there. You need to understand your existing visitor groups better (especially the boater/sailor/kayaker), define some clear visitorship goals that are in line with the mission of the NPS and start making this park more user-friendly for the people. Take the mantra of "the parks are for us to protect" to a different park that truly is in need of more protection – not one as little used as the AINL.

From: <http://www.nps.gov/legacy/mission.html>

## The National Park System Caring for the American Legacy

*"...to promote and regulate the use of the...national parks...which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."*

*National Park Service Organic Act, 16 U.S.C.1.*

The National Park Service preserves unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations. The Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world.

To achieve this mission, the National Park Service adheres to the following guiding principles:

*Excellent Service: Providing the best possible service to park visitors and partners.*

*Productive Partnerships: Collaborating with federal, state, tribal, and local governments, private organizations, and businesses to work toward common goals.*

**Citizen Involvement:** *Providing opportunities for citizens to participate in the decisions and actions of the National Park Service.*

**Heritage Education:** *Educating park visitors and the general public about their history and common heritage.*

**Outstanding Employees:** *Empowering a diverse workforce committed to excellence, integrity, and quality work.*

**Employee Development:** *Providing developmental opportunities and training so employees have the , "tools to do the job" safely and efficiently.*

**Wise Decisions:** *Integrating social, economic, environmental, and ethical considerations into the decision - making process.*

**Effective Management:** *Instilling a performance management philosophy that fosters creativity, focuses on results, and requires accountability at all levels.*

**Research and Technology:** *Incorporating research findings and new technologies to improve work practices, products, and services.*

**Shared Capabilities:** *Sharing technical information and expertise with public and private land managers.*



Jim Nepstad/APIS/NPS  
11/09/2009 07:03 AM

To :Greg Jarvis/DENVER/NPS@NPS  
cc Bob Krumenaker/APIS/NPS@NPS  
bcc  
Subject Fw: Management Plan

A late comment received via email

— Forwarded by Jim Nepstad/APIS/NPS on 11/09/2009 08:02 AM —



Gail Syverud  
<gsyverud@cheqnet.net>  
10/24/2009 09:51 PM

To jim\_nepstad@nps.gov  
cc  
Subject Management Plan

Please respond to  
gsyverud@cheqnet.net

I am opposed to the relocation of the Stockton Island campground to Presque Isle. The current beach front location provides campers with a beautiful view of Lake Superior. This experience is key to the enjoyment of Stockton Island. Like many boaters using the island, campers like to have their own space and privacy. I can not imagine being forced to camp in small congested area. If erosion poses a problem, perhaps some of campsites could be closed, more fencing could be constructed and ladder type steps installed. I would also suggest limiting the group size each campsite. Lastly, I hope the NPS has given careful consideration to regulating the kayak outfitters who have a reputation for poor back country camping practices.

Gail Syverud  
24270 Cherryville Road  
Ashland, WI 54806  
715-682-8419  
gsyverud@cheqnet.net



Jim Nepstad/APIS/NPS  
11/09/2009 07:02 AM

To :Greg Jarvis/DENVER/NPS@NPS

cc

bcc

Subject Fw: Comments of GMP for Apostle Islands NL

----- Forwarded by Jim Nepstad/APIS/NPS on 11/09/2009 08:02 AM -----



Robert Schlack  
<rschlack@carthage.edu>  
10/23/2009 04:21 PM

To Jim\_Nepstad@nps.gov

cc

Subject Comments of GMP for Apostle Islands NL

Dear Mr. Nepstad:

Before the opportunity slips away, I wanted to take a moment to commend you and your staff for the truly excellent draft of the General Management Plan for the Apostle Islands NL you have offered the public for review. As someone who uses the park during the summer season, and as a property owner in close proximity to the park at Meyers Beach, I find myself in complete agreement with your team's recommendation (Alternative 2) for the future of the park and its wilderness and nonwilderness areas. I concur with the idea of offering visitors--including those like me who are still a little tentative on kayaking--a meaningful experience on some of the nearer islands (other than what the tour boats now do), but maintaining the relatively undeveloped (but nonwilderness) portions on the mainland and some of the islands. I particularly support the idea of not placing a more developed ranger station/ visitor center at Meyers Beach--it would certainly detract from the very special place that now is for both occasional and more regular summertime visitors. In the same light, the decision--in Alternative 2-- not to extend the lakeshore trail beyond its present length--to Sand Island--is also welcomed by me and I am sure many others. The higher traffic between Meyers Beach and Sand Bay that this would allow would very severely threaten I believe the mainland area.

Beyond my personal interests, and preferences, I also enjoyed reading your document from a more professional perspective. I teach economics at Carthage College in Kenosha, Wisconsin, and one of the more satisfying courses I have always taught--since we introduced it about 15 years ago, is environmental economics. I'll be teaching it again this spring. I have always lacked for a first class document that I could use to show students how economic concepts and tools can be integrated into plans regarding the use of our common resources and, specifically, our national parks and public lands. Well, now I no longer lack such a document. So permit me to say, again, that I find the draft a thorough, thoughtful, balanced, and compelling argument on how we can at AINL be true to that "dual mission" of the Parks--enjoyment of the present and preservation as they current are for future. And with AINL, given the ravaging of the lands over the first half of this century and before, a lot of this is also the "re-wilding" that I think your draft also speaks to.

So thank you very much, on both a personal and professional level, for sending me a copy of the draft. I look forward to seeing the plan implemented. I hope that the recommendation that you, Superintendent Krumenaker, and the other professional resource managers are making for AINL is the route that is finally taken.

Sincerely,

Robert Schlack  
Profesor and Chair  
Department of Economics  
Carthage College  
Kenosha, WI 53140



Jim Nepstad/APIS/NPS  
11/09/2009 07:01 AM

To Greg Jarvis/DENVER/NPS@NPS

cc

bcc

Subject Fw: Concerning Stockton Island Campsites

----- Forwarded by Jim Nepstad/APIS/NPS on 11/09/2009 08:01 AM -----



"Madalyn Lange"  
<letterlady21@frontiernet.net>

To <bob\_kremenaker@nps.gov>

cc <jim\_nepstad@nps.gov>

10/21/2009 03:03 PM

Subject Concerning Stockton Island Campsites

*Dear Apostal Islands Guys,*

*My name is Maddy. I am 14 years old and me and my family have been visiting Stckton*

*Island ever sense I was 6 years old.*

*I think that what you are doingis a bid mestake!*

*I love the campsites that are there in Presque Bay. I'm sure that many other families love the campsites there too.*

*I know that you guise are concerned about the erosion and deterioration of the campsites,*

*but the people who ignore the walkways and help with the erosion are not entirely the ones to blame.*

*Water naturally comes up on the beach therefore washing, gradually, away lots of the sand! (Same thing with rain) If you remove all the AWSOME scenic campsites and put*

*them on the point of the Island, or where ever you are planning on moving them, think about how*

*much more erosion they are going to experience! Plus, not many people are going to want to come.*

*It's going to lose it's popularity for being one of the GREATEST Apostal Island campgrouds! Sale boats*

*won't be able to anchor down their boats for the night and ride in the calmness of the bay to a*

*pine tree sheltered campsite. They don't want to park on the point of the island where all the wind*

*from storms gets directed!!!*

*Something that might be useful in improving erosion for the campsites could be to make better*

*step ladders. I know that you already tried but maybe you guise should put the wood pieces*

*closer so that peoples' feet won't be able to escape through the middle of each step.*

*I love Stockton Island's campsites!!!!!!!!!!!!!!  
It's one of my favorite places to visit.  
And if you take that away from me and my family, we might, seriously, not come  
back  
every year!!!*

***YOU ARE GOING TO DESTROY WHAT FAMILIES COME HERE FOR!!!***

***BECAUSE THIS IS WHAT WE COME HERE FOR!!!***

***FAMILY VACATION ON STOCTON ISLAND!!!!***

*Thanks for reading my complaint,  
Maddy*

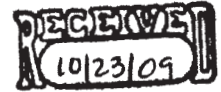
Oct 23 09 01:52p

John F. Maloney

715 779 5245

p. 1

25



**JOHN F. MALONEY**

84805 Hatchery Road  
Bayfield, WI 54814  
715 779 5261  
Fax 715 779 5245  
Jmaloney001@centurytel.net

October 23, 2009

Apostle Islands National Lakeshore  
415 Washington Ave.  
Bayfield, WI 54814

Dear General Management Planners;

After reading the attached letter to the editor, I find I share the same concerns expressed by the writer. I regret that I did not become aware of the issue earlier in the comment period.

I am particularly concerned that a historic building on a truly lovely site would be removed from its use as a museum and visitor center and become merely an administration building.

Alternative three appears to answer this concern.

My next concern is the archives and artifacts, which clearly important to the history of this national Lakeshore, the Bayfield Peninsula and the State of Wisconsin, are to be transferred out of state, making them much less accessible to those who would come to the area to see the national Lakeshore and to those already here.

While I have been assured by Jim Nepstad that the Fresnel lenses from the Devils and Michigan Island lights will remain here, there is still a question as to some of the other objects and to the actual ownership of them.

I will also be forwarding these concerns to Rep. Dave Obey and Sen. Russ Feingold.

Sincerely,

A handwritten signature in dark ink, appearing to read "J F Maloney". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John F. Maloney

Oct 23 09 01:52p

John F. Maloney

715 779 5245

p.2

Page 4  
Oct. 22, 2009



# OPINION

Gary Pennington • Publisher — Claire Duquette • Editor

## Letter to the Editor

### Bayfield history challenged by Management Plan

To the editor,

Bayfield residents who love Bayfield's history are very concerned about two aspects of the Apostle Island General Management Plan.

One item in the plan will turn the present Visitor's Center into administrative offices permanently closing to the public an historic building which the community raised \$700,000. to restore for the express purpose that this historic building be used as a Visitor's Center and open to the public.

The other item of concern involves all historic archives now in the possession of the Park Service which would be moved to a storage facility in Calumet, Michigan. These archives include many items which community members gave into the care of the Park Service in good faith as the best way to preserve them and keep them available to future generations of the community. Why should Bayfield's history, Wisconsin's history, be sent out of the state when several other

options are available to keep these archives in the Bayfield area or at least in northern Wisconsin?

I know we should have studied the General Management Plan earlier and in great detail. But the huge document (a copy of which is available in the library) is challengingly dense reading. Also the informational sessions hosted by the Park Service gave no opportunity for attendees to discuss or protest any parts of the Management Plan.

So the only opportunity for Bayfield area residents to express their concerns is in writing either to the Apostle Islands National Lakeshore, 415 Washington Avenue, Bayfield, WI 54814 or to their website: <http://tinyurl.com/ApostleIslands-GMP>.

The comment period on the General Management Plan ends Friday, October 23rd!

**Dot Harris**  
**Bayfield**

Apostle Islands National Lakeshore  
415 Washington Ave.  
Bayfield, Wi. 54814

OCT 23 '09 AM 10:24

PO Box 377  
Bayfield, Wi. 54814  
October 21, 2009

To whom it may concern:

As a person who is a member of The Bayfield Historical Society, and an individual who has lived in Bayfield for many years...and was on the Courthouse Committee...I agree with all the concerns expressed by Dot Harris in her Letter to the Editor, published in the County Journal this week.

I hope the policies proposed in your Management Plan can be thought through more carefully...particularly where the Visitors' Center, being closed to the public, and the transfer of historical documents to a place outside Bayfield (or even Wis.) are concerned.

The citizens of this Community have spent a good deal of money over the years on the building, to see that the public's interests would be served and the area's history preserved. To make the changes you propose goes directly AGAINST the desires of too many people to be done lightly. In fact, many people who worked very hard and donated a lot of money to provide an open-to-the-public visitor's center and were very much in favor of the AINL are probably turning over in their graves at the mere "thought" of what you are now proposing.

Not all changes are "bad," but THESE ARE!

Mary Hepner

11/29/09

28

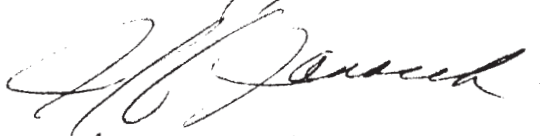
PARK SUPERINTENDENT  
 APIS  
 415 WASHINGTON AVE  
 BAYFIELD, WI 54814

GREETINGS:

MS. MC DONNELL STATES IT FAR BETTER THAN  
 I. I'VE BEEN BRINGING MY BOYS TO PRESQUE  
 ISLE SINCE THEY'VE BEEN IN DIAPERS. (THEY ARE  
 NOW 17 & 18 AND STILL SAY IT'S THEIR FAVORITE  
 PLACE IN THE WORLD (AND THEY'VE BEEN TO DISNEY  
 WORLD!)) I CAN'T IMAGINE ANY ATTRACTION TO A  
 CAMPSITE IN THE WOODS.

YOUR STAFF CAN PROTECT THE PARK AND ALLOW  
 US TO ENJOY IT WITHOUT CLOSING IT OFF.  
 PLEASE LISTEN TO CINDY'S WORDS.

SINCERELY



JEFF JANACEK  
 845 BURKE CT  
 MAPLEWOOD, MN 55109

NOV 2 '09 AM 11:55



Jim Nepstad/APIS/NPS  
11/09/2009 07:01 AM

To :Greg Jarvis/DENVER/NPS@NPS  
cc  
bcc

Subject Fw: Stockton Island Proposal

----- Forwarded by Jim Nepstad/APIS/NPS on 11/09/2009 08:01 AM -----



"Dave Lange"  
<dodger8118@frontiernet.net  
>  
10/21/2009 11:29 AM

To <Bob\_Krumenaker@nps.gov>  
cc <jim\_nepstad@nps.gov>  
Subject Stockton Island Proposal

Bob Krumenaker,

I am greatly disappointed and disturbed by the current proposal to close the lake-side camp sites on Presque Bay, Stockton Island, and move them to another area of the island.

My family has been visiting the island for about 10 years now. We travel with all our camping gear by boat to stay at the camp sites for usually a span of seven to ten days. Moving the sites creates an impractical distance for us, as boaters, to use the area. It is unrealistic to suggest that we transport our gear to sites that are not in close proximity to shore.

Most of the time there are no spaces at the dock. Nor do I want to be forced to use the dock as I have had items stolen in the past. Rather, I choose to moor out from our camp site so as to keep an eye on our boat and equipment. Doing so requires constant vigilance in watching for unwanted boat movement due to weather conditions. This would be impractical with a campsite located any other place. Transporting our camping gear could take 20 trips or so and that is not practical with a site with any distance from the shore. Those of us who come to the Apostle Islands visit Stockton Island for the beauty of the area and the camp sites-which are easy to use. Closing these sites will remove our ability to come and enjoy this area and end a wonderful 10-year tradition.

What disturbs me is the reasoning and the motivation behind such proposals. What is being done is nothing more than putting the "needs" of

nature above the needs and desires of humanity. It's like saying my kids cannot play in the back yard because they may turn over the grass. I think there has been much exaggeration of the problem and some short sidedness on the ease of the solutions on the part of those behind this proposal. I think both interests, nature and humanity, can be properly balanced with proper management.

With regard to erosion control, much of it is caused by weather issues as seen in site #7. Relocating sites is not going to change this. However there are issues with regards to site access. I have had the opinion for many years that a proper flight of stairs needs to be constructed for site access. Sand-ladders simply do not work other than giving a semi sure-footed climb up from the beach. Actually, they only aid in moving the sand from the top of the ladder down to the base of the ladder leaving large vacant spaces under the ascending rung. This action of erosion only draws in the sand from the surrounding areas to fill in that which was pushed downward. Just look at how the access sites look. The erosion radiates outward from the ladders. They are hard on your feet and ankles, and they are actually quite easy to fall or slide off of altogether. As a solution, people have simply walked up and down beside the ladder in the sand - which causes erosion even more. We have knowledge of this first hand from observing the erosion of use year after year and our trying our best to use the ladders during our own visits. In the western states where erosion is a concern, they have had great success with solid, permanent stair systems in place with hand rails. This is what these camp sites also need - permanently installed steps on 4x4 or 6x6 posts anchored below the frost line with hand rails to encourage easy use. I feel this simple step will solve 90% of the erosion caused by people over the past years. It should have been done many years ago when erosion was first noticed as a problem. Also, posting signs that say "Keep Off" or roping off certain areas has been successful in other national parks. Why not here? Why close these sites down, angering a lot of people in the process, when you haven't tried these common sense, problem-solving solutions?

As far as bear issues are concerned, I think that has already been addressed. You have done a great job of educating the people. Because of this, the bear issues have been greatly reduced or even eliminated. It would seem the bears have grown accustomed to the current arrangements. Changing the situation might bring confusion.

When it comes to archeological items, let me ask a question. Once these sites are moved, are we going to start an extensive archeological dig on the bay? If so, wouldn't the dig require clear-cutting and removing that which holds the soil together? I think you would agree that this is preposterous. If there are any other artifacts there, they will remain there. Over the last 10 years with all the erosion that has happened, I or my family have never seen even a hint of a single artifact surface. This topic of concern seems to have been put together to try to mandate the need for change. Set up a screen over a campsite and take some pictures and call it an archeological discovery. I find that suspect.

Moving on to the outhouse/toilet issue. There are several new innovations for pit toilets. Why not consider these other options? I would contend that cleaning out these toilets once a year is just a necessary process of providing for the public needs. It becomes part of what we pay for.

These islands are some of the most beautiful places in the Midwest for camping and has been that way long before the park took over managing them. Please don't change a good thing and be guilty of its demise. These lands are for the people and we certainly are not destroying the resources. Just take some common sense approaches to management and all can be happy. Installing a permanent access to each site would go a long way in eliminating erosion. Keep these areas open. Closing them and moving them would limit this area to ferry-boat hikers only. The manner in which this proposal has been conducted makes one wonder if that has been the intention all along.

Please don't close this place and take it away from my children and their children. It is a tradition that my kids would like to pass on to theirs.

We're trusting you will make the right choice.

Dave & Kathy Lange  
33025 Jewel Ct.  
Chisago City, MN 55013  
651-257-3681

Email: [dodger8118@frontiernet.net](mailto:dodger8118@frontiernet.net)



Jim Nepstad/APIS/NPS  
11/09/2009 07:01 AM

To :Greg Jarvis/DENVER/NPS@NPS  
cc  
bcc  
Subject Fw: GMP Comment from George Haecker

----- Forwarded by Jim Nepstad/APIS/NPS on 11/09/2009 08:01 AM -----



Bob Krumenaker/APIS/NPS  
10/13/2009 07:34 PM

To Jim Nepstad/APIS/NPS@NPS  
cc  
Subject GMP Comment from George Haecker

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**Bob Krumenaker**

Superintendent, Apostle Islands National Lakeshore  
& Gaylord Nelson Wilderness

- 415 Washington Avenue, Bayfield WI 54814
  - 715/779-3397 x101
  - bob\_krumenaker@nps.gov
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- 

----- Forwarded by Bob Krumenaker/APIS/NPS on 10/13/2009 08:33 PM -----



George Haecker  
<ghaecker@bvh.com>  
10/13/2009 06:07 PM

To "Bob\_Krumenaker@nps.gov" <Bob\_Krumenaker@nps.gov>  
cc  
Subject NPS funding

Bob....at long last I have a little more info on my 80% - 20% comment this summer: as corrected, it came from the NAPA report on the NPS numbers thus: funding for natural resources went up \$77M, with an increase of 31.5%, while cultural funding went down 28%.

I will do the survey but put me down for Alternative 2 of the MP with the added comment that all historic resources weather on the Register or not (most all are eligible) should be adaptively reused or maintained. Moldering away should not be an option.

Thanks and best,

GEORGE HAECKER , AIA

PRINCIPAL  
BAHR VERMEER HAECKER ARCHITECTS

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bvh.com

**Bob Mackreth**

500 Woodland Drive  
Washburn, WI 54891  
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October 22, 2009

Apostle Islands National Lakeshore General Management Plan  
National Park Service  
Denver Service Center -- Greg Jarvis  
PO Box 25287  
Denver, CO 80225

Dear Mr. Jarvis:

Thank you for the opportunity to review the alternatives offered for the Apostle Islands National Lakeshore General Management Plan.

I base my comments on twenty-seven years of experience as an employee of the National Park Service, the most recent twelve of which were spent at Apostle Islands National Lakeshore. In my time at Apostle Islands, I served first as District Ranger, then as Cultural Resource Management Specialist, giving me thorough knowledge of the park's resource base, and its operational challenges.

I would like to commend the planning team for the effort they have expended in examining the issues facing the Lakeshore. The document produced has clearly been composed by authors who share my deep concern for the future of the park.

It was my privilege to serve on the planning team during its early stages, before my retirement, and I vividly recall the energy and passion of the discussions that began this planning process. It is in that same spirit of dedication to the values of the park, and gratitude to those who established it, and to those who continue to care of it, that I offer my comments on the evolving plan.

### **The Future Of The Light Stations**

I am pleased to note that it is no longer considered necessary to express the positions contained in the preliminary GMP document "Options For Future Management," offered in 2006, that it is unlikely there will be sufficient funding available to preserve the lighthouses. I consider it appropriate that there is no longer a perceived need for "triage" or "mothballing" at the light stations, nor discussion of separate standards of preservation for the light towers versus other associated historic structures. In fact, the planned restorations of two more light stations, to be chosen from among Outer, Michigan, or Sand Island lights, is certainly good news.

**Bob Mackreth**

**General Management Plan Comments**

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It would be helpful to present information on the factors that will be used to decide whether to continue to focus on these three sites and select among them, if that is necessary. In addition, while not advocating a full restoration, I would strongly urge that a small exhibit space be established at Devils Island to interpret the history of the lighthouse under Coast Guard administration. This historic period is rarely discussed in current park interpretation; yet Devils Island was in the care of the Coast Guard nearly half of its time as a manned light.

I concur fully with the mandate to preserve the cultural landscapes of the light stations and to restore the historic grounds at Raspberry Island. Vegetative encroachment has been a critical threat to these resources in recent years, and much work will need to be done to achieve this goal. It is possible that current and future partner organizations could be used for this purpose.

Finally, please note a factual error on page 192: U.S. Coast Guard logs in the National Archives establish that the North-South Road on Devils Island was constructed in 1954, not 1960 as written here. (Digital copies of these logs are on file at AINL headquarters.) This is not a trivial distinction; knowing the correct date of construction, it can be seen this cultural landscape feature has already passed the 50-year presumptive National Register threshold.

### **General Cultural Resources**

The plans put forth for sites like the Rocky Island fishing settlement and the Shaw Point/Camp Stella complex on Sand Island propose preserving and interpreting only "contributing structures" listed on the National Register of Historic Places.

I note that the authors elsewhere approvingly quote William Cronon's essay *The Riddle of the Apostles*:

*(The Apostle Islands are) a superb example of a wilderness in which natural and human histories are intimately intermingled.*

The final plan should follow a recommendation from the same article. Rather than limit preservation to Register-listed sites, a standard which the author notes sets an unreasonably high bar, Cronon recommended instead a policy of "no further removals:"

*...the default management assumption should be that existing human structures and artifacts will not be removed even from designated wilderness. 'No erasures' should be the rule except where absolutely necessary.*

**Bob Mackreth****General Management Plan Comments**


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The National Park Service has already removed the vast majority of structures on the archipelago. The handful that remain represent only a small fraction of the structures in existence on the islands at the time of the Lakeshore's establishment.

The final plan should take into account the well-established principle that, as in any other scholarly discipline, viewpoints in the field of history evolve. Allowing removal of so-called "non-contributing structures" will freeze the site according to current perceptions. The field of historic preservation is replete with sites once considered lacking in significance that came to be seen as worthy of preservation upon further research. The most notable examples might be slave quarters at parks like Independence NHP, but even at the Apostle Islands the NPS tore down, or demolished through neglect, structures that would undoubtedly have been judged significant given proper consideration.

I note with particular concern that it appears that even National Register designation does not ensure preservation according to the preferred alternative. The language of the preferred alternative leaves the park substantial latitude for removal of Register-listed properties, eg. page 123:

*Structures that are not listed in the National Register, are unsafe, or do not have utility for park operations would be removed and the areas re-stored, or in some cases allowed to molder to natural conditions.*

Interpreting this language as written, even significant structures might be demolished if deemed lacking in "utility;" while certainly, if neglected long enough, any structure will eventually become unsafe and thus subject to demolition.

This section should be completely rewritten, with clear language that affords historic structures the same level of assured protection given all other park resources.

### **Stewardship of the Park's Museum Collection**

The draft plan includes (pp. 36 and 64-65) a discussion of the undesirable proposal to move the park's "core museum collection" to a storage facility at Keweenaw National Historic Park, far from the community whose heritage these items represent. If such a scheme is implemented, the expense and inconvenience of the 360-mile round trip to Keweenaw will effectively mean that these items will never be accessed by park staff or visitors again. In addition, the historic resources and context of the Lakeshore will be compromised.

The transfer proposal is presented as a *fait accompli*, and there is no discussion of advantages or disadvantages to the scheme. The proposal was not mentioned in the 2006 "Options for Future Management" document distributed to the public, and there has been no consultation with the public in development of this proposal.

**Bob Mackreth**

**General Management Plan Comments**

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The importance of community involvement in this matter will be readily apparent to observers with institutional memory going back to the years 1989-1992, when Apostle Islands National Lakeshore was embroiled in a controversy concerning a very similar situation. Without consulting the park or the community, the US Coast Guard removed the Fresnel lens from the Devils Island tower and moved it to a storage facility not far from the proposed Keweenaw site. Local citizens initiated court proceedings against the Coast Guard, with the knowledge and cooperation of the National Park Service, and eventually compelled the Coast Guard to return the lens to its original location. It is surprising to see the National Park Service now proposing a comparable measure.

Whatever the genesis of this plan, it is clearly an issue that should be addressed in the General Management Plan process, and subjected to the same degree of public consultation and scrutiny as the rest of the plan. If park management feels the need to address stewardship of the collection, there are many alternative solutions besides removal, including improving storage facilities at the park, or establishing cooperative arrangements with local repositories maintained by the Wisconsin State Historical Society or the Bayfield Heritage Association.

### **Management Zoning**

The management zoning scheme is complex and somewhat confusing; I question the need for separate "primitive" and "backcountry" zones.

I also note that the maps accompanying the document appear to show a number of important cultural sites contained within the so-called "primitive" zones, where they would be "minimally managed," and the park's emphasis would be on promoting a visitor experience "in an area that generally appears to have been primarily affected by the forces of nature." This would inevitably compromise the protection of these sites; examples include the Hermit Island quarry, the National Register-listed Trout Point logging camp on Stockton Island, and Register-eligible logging camps on Oak and Outer islands.

In addition, the map supplied with the document appears to indicate that several areas of indisputable historic significance on Sand Island are not included in the "historic zone:" the East Bay settlement area, the Noreng farmstead, the north-south and east-west roads, much of the Shaw Point area, and even (it appears) the Fred Hansen farmstead, currently undergoing preservation treatment. Could these omissions simply reflect a mapping error in the current document? Whatever the reason, they should certainly be corrected in the final plan.

The final plan should adhere to the expressed intent of Congress in setting the boundaries of the Gaylord Nelson Wilderness. Congress specifically excluded several portions of the park from the Wilderness due to their high level of historically significant sites, and their

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potential for preserving and interpreting the human heritage of the islands. These exclusions included all of Sand, Long, and Basswood Islands, and the historic fishing settlement on Rocky Island. It is clear that Congress intended these excluded areas to be managed in a manner that would preserve their cultural values; failure to include them in the "historic zone" would certainly be counter to this intent.

### Questions of Nature and Culture

National Lakeshore Superintendent Bob Krumenaker has noted elsewhere,

*There is no better example in the national park system of a place where the natural is integral to understanding the cultural, and the cultural is integral to understanding the natural. They are intimately tied in the Apostle Islands.*

Consistent with this principle, the planning document should avoid unnecessary conflict between natural and cultural features, both in language and in specific proposals.

I am concerned to read (p. 14) that one of the park's primary interpretive themes will be, "After being altered by centuries of exploitation, the Apostle Islands environment is regaining its wilderness characteristics."

This harsh judgment lumps all island inhabitants, including Native Americans and pioneer farmers, into a single, seemingly rapacious group, doing a disservice to the complex history of the archipelago's human occupation. As Cronon wrote,

*Such words do no more justice to the complexity of human lives in the past than they do to our own lives in the present. They implicitly dishonor the memories of (island residents) like Burt and Anna Mae Hill who once made their lives here and who presumably loved these islands as much as we do.*

I would urge the authors to replace the word "exploitation" with a less pejorative term such as "human occupation."

Another example of this potential conflict is the draft plan's recommendation that in order to protect natural resources "Future facilities will be built in previously disturbed areas..." increasing the risk to archaeological sites and other cultural resources. (p. 24) This is a continuation of a long-standing and misguided park practice that ignores the fact that so-called "disturbed areas" in the Apostles typically represent multilayered cultural sites. In the past, this policy has led to placement of campsites on historic sites and the construction of the Presque Isle facility complex on a Native American archaeological site.

**Bob Mackreth**

**General Management Plan Comments**

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The final General Management Plan should clearly and explicitly jettison this harmful practice.

### **Little Sand Bay**

I question the desirability of downgrading services at Little Sand Bay by replacing the visitor center with a limited-service visitor contact station. This area has proved tremendously popular with the public, providing a sampling of the park experience to visitors who for whatever reason cannot make the boat trip to the islands themselves. Over the years the Federal government has invested heavily in upgrading the facilities provided here: not only National Park Service efforts such as the comfort station, wastewater treatment system, expanded parking facilities, and the substantial harbor itself, but also the Federal Highway Administration-funded paving and realignment of the entrance road.

In addition, Little Sand Bay is one of the few park facilities well-suited for powerboat and sailboat access, serving an important segment of the park's recreational user population. I would urge the park to commit itself to the repairs necessary to the site, including replacing the marina finger piers and resuming the practice of periodic dredging of the harbor entrance.

It is only a short time since the National Park Service conducted a thorough planning process for Little Sand Bay, culminating in a sound Development Concept Plan completed in 2002. This plan provided a well-crafted framework for development of this crucial site; the NPS should follow its recommendations.

### **Partnerships**

I am pleased to note that the current document endorses the development of partnerships to ensure effective accomplishment of the NPS mission, e.g. page 18, "NPS staff will continue to establish and foster partnerships with public and private organizations to achieve the purposes of Apostle Islands National Lakeshore. Partnerships will continue to be sought for research protection, research, education, and visitor enjoyment purposes.

Experience throughout the National Park system has shown that properly administered partnership arrangements have provided substantial benefit to the National Park Service in management and protection of cultural resources such as those Apostle Islands. Examples range from the farmstead restoration work accomplished by "Save Historic Sleeping Bear" (Sleeping Bear Dunes NL) to the key role played by the Fire Island Lighthouse Preservation Society in the restoration and operation of Fire Island National Seashore's signature historic site.

**Bob Mackreth**

**General Management Plan Comments**

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While the plan is lacking in specifics, I concur with the general direction expressed. Experience has clearly shown that NPS funding alone has been inadequate to ensure preservation of the park's cultural resources; development of cooperative partnerships can go a long way to addressing the unmet needs.

#### **Selection of Alternatives**

Given the concerns noted above, I cannot unreservedly endorse alternative number two, the NPS "preferred alternative." However, I vividly recall the planning process which finally resulted in the establishment of the Gaylord Nelson Wilderness: the final plan represented a combination of the alternatives initially offered for consideration. I believe a similar process of synthesis and revision would result in a sound General Management Plan for Apostle Islands National Lakeshore.

Thank you again for the opportunity to comment on these alternatives and for the effort and commitment that went into their development.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bob Mackreth", with a long horizontal flourish extending to the right.

Bob Mackreth

**Robert J. Nelson- 33695 Milligan Road, Bayfield, WI—54814  
(715) 779-5283**

October 21, 2009

National Park Service  
NPS-AINL- GMP Team Leader  
Mr. Greg Jarvis  
Denver Service Center  
P.O. Box 25287  
Denver, CO 80225

**RECEIVED  
OCT 26 2009  
DSC-P**

Dear Mr. Jarvis,

I am pleased to submit my personal comments related to the draft General Management Plan (GMP) National Park Service- Apostle Islands National Lakeshore (AINL). Thank you for this opportunity to share my thoughts. As the project manager of the plan I commend you and the AINL staff for the hard work in preparing this detailed document that will serve as the guidance blue-print for years to come. The document is professional laid and neatly orchestrated. At times I noticed the document lacked minute detail and clarity. As written, the document commanded me to "read between the lines" a bit. The draft GMP manual and summary booklet did serve me well.

Please note further that although I am the Chairman of Apostle Islands Historic Preservation Conservancy (AIHPC) I share my personnel perspective here. My other roles in the community involve me as Board Member of the Bayfield Heritage Association and as the President of the Board of Education- School District of Bayfield. I share a "use and occupancy lease" with my sister at Rocky Island. Where I address "Educational Opportunities in the Gaylord Nelson Wilderness", I speak for myself and do not represent the School District of Bayfield, the Board of Education or the District Administrative Team.

Preservation of local history, open and transparent governance, fiscal prudence, along with NPS-AINL efforts to further develop partnerships and collaborative agreement efforts with local governments and non-profits like AIHPC are my central themes that drive my feelings in the topics that follow. The topics addressed carry equal consideration weights.

**GMP Topic: Educational Opportunities for all Americans in the Gaylord Nelson Wilderness**

While perusing the Draft General Management Plan for Apostle Islands National Lakeshore, as discussed on page 92, I ventured upon the statement, "*All education and interpretation efforts will be located outside the wilderness area*". I would assume all K-12 and post secondary schools in Wisconsin are included. If this provision means what it appears to say, then I must ask what its possible justification can be. There is nothing about education that harms wilderness. The Lakeshore was set up in part to promote education. All visitors should have the opportunity to learn first-hand about the wonderful wilderness aspects of the Apostle Islands.

On pages 15-17, the draft GMP addresses special mandates and administrative commitments that include reference to Treaty Rights, other Reserved Rights, and a MOU. Under Treaty Rights reserved and protected by the 1854 Treaty. I believe that Native children may have the right to educational opportunities in federally protected Wilderness status. That right is important.

The Red Cliff Band of Lake Superior Chippewa community members are stakeholders in the School District of Bayfield. Bayfield Schools have a student enrollment that is about 75% Native American. I am wondering if, and concerned that non-native students, who sit side-by-side in the classroom with Native children, could be excluded from the privilege to learn in a wilderness setting?

Federal and state laws guarantee equal educational opportunities for all students. If the non-native students can not sit side-by-side with Native students in a school district facilitated learning session in the Gaylord Nelson Wilderness landscapes as the draft GMP so states, a school district could be determined in violation of the equal educational opportunity rights. A non-compliance grievance or even litigation could be the end result. If litigation resolves against the district that was determined as derived as a result of NPS-AINL exclusionary practices (as what the verbiage appears to relay), the continued outcome and follow-up thereafter would be very interesting.

**Recommendation:** Retain the integrity, health and welfare of the special wilderness features at AINL at all costs, but be reasonable and ensure that educational opportunities abound in the Gaylord Nelson Wilderness for all citizens, young and old, in this wonderful outdoor learning center.

**GMP Topic: Transfer of Local Artifacts from AINL to Keweenaw National Historical Park:**

The proposal to transfer the Apostle Islands National Lakeshore "core museum collection" to a storage facility at Keweenaw National Historical Park is mentioned twice in the General Management Plan alternative document. While the NPS Regional Office has authored its content, and the local NPS-AINL is in full support of artifact removal, I am adamantly opposed to the edict as presented on pages 35, 64-65.

The "transfer issue" was addressed in the past locally by the Bayfield, WI community at large with NPS-AINL. While I was not offered a seat at that table, I was reasonably assured by those who attended that the history of this area would remain at AINL. The "down play" and "move forward anyway" sell approach of this NPS-AINL issue at that time and potentially more to the community exacerbates a doctrine of NPS generated mistrust to me personally.

As I read the draft GMP and whereas all other aspects of the GMP are presented as proposed actions subject to public review, the transfer of museum objects is to me is completed and is a "done deal". The decision to remove all local historical artifacts, photos, and documents already has been made.

Where has the public been further consulted on this decision? Where is the evidence that laws have been followed for such a significant decision that alters the social and historical context within which the AINL exists and, indeed, for which it was created?

**Local history:** I offer evidence here that in early years of AINL, the bell was rung to the community at large from NPS-AINL that local history and interpretation was extremely important to the park at that time. To come forth and share photos, stories, and documents of the Apostle Island area was the crier's call. My Nelson family rallied and submitted many a historical photo of Presque/Stockton and Rocky Island fish camps. Many other commercial fishing, island families and locals responded similarly. The intention of sharing of family lives by my family was that the public at large who sought insight into the hallways of yesterday, and especially island life from the early 1900's to pre-park would have bona-fide, quick, easy, and local access to the history of the islands. This was, and is still especially important information that can be relayed to the children of local school districts, local and academic historians, and even the families of antiquity.

**Recommendation: Remove Transfer of Local Artifacts lines from the GMP vision:** Under the Draft GMP as presented, the expense and inconvenience of the 360 mile round trip to Houghton means that effectively these artifacts would not be easily accessed and is quite contrary to, and negates the original "bell ringers" call to share the wealth of history at the local level. I ask that this issue be reconsidered, removed from the table, and that AINL local artifacts be left where they are at dedicated storage facilities within the Apostle Islands National Lakeshore.

**GMP Preferred Alternative # 2 Topic: Meyer's Beach Upgrade to Visitor Center:**

My position is that the proposed idea that Little Sand Bay, as a world-wide NPS destination & vacation site, that offers immediate access to the western end of AINL archipelago, should remain the primary visitor center site located on NPS shoreline properties. LSB is an active and viable complex; heavily used. That this visitor center paradise site is being considered for a downgrade status to "contact station" and then upgrading Meyers Beach to a visitor center status is not well thought out, and is imprudent. Further, building a new Visitor Center at Meyers Beach to replace LSB to me doesn't offer practical, financial, security, or human safety related common sense. Here's why:

Millions & millions of past Federal dollars have been spent by the park expanding, grooming and advertising LSB as a high quality destination site and visitor center since park conception in the early 70's. And a wonderful job the park has done!

This site not only functions as Visitor Center presently, but also as an existing harbor of refuge, campground, and recreational complex. LSB is a wonderful example of past good governance practices enhanced by cooperative agreements with the Township of Russell. Another expensive visitor center site is simply not necessary or worthy of inclusion into the final GMP at this time.

**Local History:** In the early years of AINL, long-long before the Meyers Beach proposal surfaced newly in the GMP, the Little Sand Bay-Herman Johnson property, the Hokenson fish camp, and the Alden Allen beachhead properties were coveted for purchase by NPS for their access site qualities to Lake Superior and the Apostle Islands. Hundreds of thousand of tax dollars were laid on the table and expended to purchase that land.

As time went on millions of dollars more have been expended toward improving the quality of the Sand Bay visitor center and access site. A new marina was built by Frank Tomlinson Construction (about \$ 800,000.00 in or about 1988). The marina costs also secured an upgraded improvement of the old boat ramp & launch and added a new Town of Russell pier and breakwater. A new water main system was installed in the past (about 1981), then recently replaced. New sewer lines have been installed. Buildings, living quarters and shop facilities, have been upgraded at good and prudent expense; some were razed. Little Sand Bay has it all. The complex is a high traffic multi-purpose destination site for thousands of tourists and park patrons.

Further funds were appropriated and a re-built County Trunk K was completed by NPS, a marina and accompanying campground addition complex were appropriated with Federal dollars. My thinking is that LSB has been as large or possibly larger a park destination site than the mini-camps in the islands. Please note that I felt the valued accomplishments in consortium often with the Town of Russell, was smart and prudent.

Additionally the Little Sand Bay Visitor site area some of the existing buildings were restored and updated. The "Twilight" [Eskel and Roy Hokenson commercial fishery boat and out-buildings] were restored for interpretive purposes. The old fish dock was upgraded for safety. A repository for local artifacts was incorporated into an on-site and pre-existing building structure.

The cooperative agreement & MOU type arrangement with NPS-AINL and the Town of Russell was the catalyst that ensured the addition of a wonderful camp site area at LSB. The improved camp site area included an enlarged parking lot, men and women restrooms/changing rooms, RV trailer sites and parking spaces. A cost of \$2.3 million (as per Town of Russell meeting minutes) was expended. Hardly a day goes by when the campsites aren't near to completely full. The boat ramp is very busy daily. The recreational complex/swimming beach area has substantial numbers of kayaker's, picnickers, and swimmers. The complex receives a wider variety of user groups than Meyers Beach could attend too.

**Safety Issue:** "The Lake is the Boss" is a statement my father originated and is now coined for profit by NPS-AINL, at least on T-shirts they sell. Romantically the Meyer's beach siren sings to visitors to share a beautiful panorama on a fair summers' day. A wonderful beachhead invites and gathers the crowds. But be it known also that the siren sings chorus to the wrath of Lake Superior.

Lake Superior never gives up her dead is an old Gordon Lightfoot song lyric; she is dangerous and recently has been deadly to the kayaking user group. As evidenced by tragic kayaking related deaths recorded at AINL in the Squaw Bay Sea Caves and the near by open lake areas over the last few years, I predict the trend will continue; someone is accountable. With major winds blowing northerly to this southern shore, the Meyers Beach site is open fully to Lake Superior's heavy gale winds with up to 10-20 feet summertime swells and seas at times. Meyers Beach is not even relatively well-sheltered, as is the harbor refuge that is offered at Little Sand Bay. Water related policy and/or compendium activities NPS deploys at Meyer's Beach I believe needs further review.

Meyers Beach however could and should be a nice contact station with an esthetically pleasing vista and educational kiosk arrangement in place that includes access to the already very nicely done, environmentally friendly, and adequate walking trails to the sea caves. This option would better serve NPS mission and management plans related to public access, safety, and educational purposes. The newer arterial, roadway and parking lot arrangement at Meyers serves my recommendation well.

Finally: How much would a potential Meyers Beach contact station upgrade cost financially? Like the potential Visitor site complex in Bayfield and the Meyers Beach visitor center, nowhere in this document are those type of facts provided.

**GMP Alternative # 2 Topic: Construction of a "New Visitor Center Somewhere in Bayfield"**

Promote and perform more maintenance on existing properties instead of more spending on new building- The "pre-serving for the ages" concept" I subscribe to is not only related to our national treasures- the Apostle Island light-houses, but equally applies to all park amenities that include; historic sites and landscapes; existing historic districts; and past identified/operational historic fish camps and Native American sites. Thankfully our Congressional team has been the coordinator and stimulus factor behind major lighthouse restoration opportunities recently. Face-lifts don't cut it.

"Maintenance for the ages" at NPS visitor facilities at Rocky Island, Sand Island, Manitou Island, Devils Island south landing, South Twin docks, Stockton Island (Quarry Bay) dock, toilets, trails, rest facilities, drinking water wells, informational overlooks and kiosks, etc are equally important. The degradation of facilities (rest facilities, wells, docks, and historic buildings especially) in the past has been painful to watch in my past 45 years of park observation. That pattern is contrary to my passion for preservation and comfortable access to the property the people own and hold dearly, and of which the park maintains on their behalf.

Preferred Option #2 adopted as is I believe will set back historical preservation opportunities in the Islands in that new projects would be prioritized over the existing and unfunded preservation projects already in the dire traits.

If adopted as is, Preferred Option #2, while it may temporarily bring jobs and families to the area, the option is not necessarily a potential boon to the local economy and community. Taxable lands will be taken from the tax base. Who knows if the option would offer at least equal to what it may provide in revenues. This proposal/action may actually deplete much needed revenue generated from the local tax base. Adversely affecting community projects and the School District of Bayfield could be the unintended outcome. I am not convinced potential revenue generated would offset the losses. For 150 years Bayfield has been a tourist designation; the visitor centers at NPS and Chamber of Commerce are adequate. Collaborative efforts seem to work well.

I know for a fact that the waterfront properties (an artificial land base which were formerly Lake Superior bottoms) in Bayfield and the Visitor Center complex that is on the front burner here and that available for such a complex would be primarily built on slabs of the former R.D. Pike and Henry Wachsmuth sawmills of the 1870's to 1925. As such, potential building state and local codes will be in play. While NPS-AINL could muscle its way through with special permits, etc. NPS-AINL would be exposed as at odds with their own mission to be recognized as the standard for environmental stewardship and that as a leader by example.

**Recommendation: GMP- Option 1- No Change:**

**Topic: Abandon Roy's Point Maintenance Area and the Contract to Rent:**

That the storage facility at Roy's Point rental contract should be allowed to expire as per DGMP Option #2 recommendation, p.125 is a good idea. I ask you to consider my caveat to the proposal as an even more prudent recommendation. Well known in the community is that approximately \$30K rent per month is expended on this facility rental. The cost equates numerically to \$360 K per year fixed cost. The rental arrangement provides for accommodation of the dozen or more NPS boat fleet dockage and storage, a fenced in security area, and a very nice work shop and storage arrangement. Roy's Point Marina is truly a state of the art marina complex that was financially the recipient of millions of dollars of NPS-AINL support.

With Little Sand Bay complex already in play as an existing maintenance site, now very easily NPS could house the fleet of boats in winter storage in their new parking lot. NPS could build its own maintenance building, similar to Roy's Point with saving derived from part of the \$360 K For quick access to the eastern end of the Island archipelago the larger and smaller vessels NPS holds in the breach could be docked at local marinas. (It's only two miles from Bayfield-Harbor Lodge is North of Roy's Point about two miles) The larger vessels could be lifted and stored at a local marina. The smaller boats could be pulled and serviced at Little Sand Bay. The park would save hundreds of thousands of dollars. Fiscally Prudent.

**Topic: Insert Stronger “Partnership and Collaboration with Local Citizenry Language:**

The NPS has worked diligently to maintain existing properties with the limited funds available, and deserves credit for its efforts and the difficult choices they have had to make. However for far too long, the magnificent historic buildings, sites, and properties in AINL have been in a state of decline because of the absence of federal funds. Many a National Park has formed partnerships with one, two or more non-profits, with local governments, and with State and National paid and volunteer corps, families, and foundations.

The partnership concept referred to in several places, and is so aptly discussed in the AINL 2001 Business Plan, should be developed in more detail in the final Plan. There are many tools available for partner involvement in maintenance and preservation, and as have been used in similar units of the national park system (Indiana Dunes, Cape Cod, etc.) that would be a perfect fit in the AINL. The final plan should build on the basis set in the draft plan for such arrangements. This is especially true and important because historic use and occupancy families such as my own are willing and able to work in that role.

**Topic: More Recommendations:**

- **Continue partnering with Northern Great Lakes Visitor Center (NGLVC)** The NGLVC personnel direct substantial numbers of tourist visitors to the NPS-AINL visitor centers as well as greater Bayfield events like the island boat tours. That effort alone generates substantial revenue for the park. NGLVC as well provides wonderful natural resource related educational opportunities for the public and our students; a nice fit that coincides with the mission of NPS-AINL. Furthered NPS-AINL commitment to working with the State of Wisconsin, University of Wisconsin Extension, Friends of the Center, U.S. Fish and Wildlife, National Forest Service and local Chambers of Commerce is a smart governance tool and wise choice.
- **Developing a cooperative/partnership agreement--MOU or legal, a fixed contract with the Township of Russell** to perform operational management duties at the Little Sand Bay may be of value. With a 2.9 million dollar per year budget and 36 employee's available p. 118, the park in the past has offered the written position they do not have necessary funding or personnel to oversee many "could be" projects.

NPS-AINL and the GMP planning team should consider offering the operational management of Little Sand Bay to the Township as an amendment to the GMP. In my opinion the Township of Russell governing team is a qualified candidate. .

**Topic: Recommendations Not in GMP:**

- **LSB marina** needs much needed maintenance and TLC, [like some good finger piers need replacement that were left to the extremes of winter in 2007.08 to freeze in the water and rip apart in the ice]. Some basic upkeep on the remaining buildings is necessary. An additional need is the creation of a board walk span (75-100' by the present width) from the beach head to the first crib structure would allow lake water to flow freely along the beach and that effect would allow for minor wave action that will eventually allow for a natural sand removal and thereby demand less dredging efforts.
- **Initiate potential projects for partnership consideration** that include *Plenty Charm Cottage* at the southern end of Sand Island's East Bay settlement, the *Fred Hansen Homestead* on Sand Island, *LaPointe Light Station Vegetation Management*, and the *John Nelson Cabin* in Little Sand Bay. On an AINL "to do" list in the recent past, many "to do's" are still headed toward a state of squalor. These identities are important time capsules of a rich local history and deserve much more NPS-AINL care. In my opinion, some are worthy of National Historic Site and/or District recognition that could be implemented and lead by NPS in consortium with non-profits.
- **Not specified by Congress exclusively and listed on the NPS-AINL "to do but can't because lack of funds"** list, I would ask that NPS-AINL in the GMP specify and offer to conduct an assessment of the general health and welfare of Sand Island Lighthouse that would include collaborative partnerships as a foundation corner

- I am requesting that new facilities not be built anywhere or at any time until funding for the historic building structures-associated landscapes and park amenities in AINL are appropriated for, completed, and paid for. NPS-AINL should stay focused on fixing what you have, then move forward with a fiscally sensitive approach that includes partnerships with the citizenry at large, non-profits, and any American who will give a financial and working hand to preserve this wonderful park.
- In the event that the historic West Bay Club comes under Park Service management in the absence of a co-operative partnership approach that ensures its long-term preservation and maintenance, it should be placed among the highest priority federal management responsibilities before money is spent on new facilities for which there is no demonstrated need.

**Summary:**

I am asking that you consider re-configuring the GMP final edition to reflect the considerations that I did bring to your attention. NPS-AINL is a national treasure and wonderful gift to the people of this great nation and should continue to grow progressively, but not at warp speed.

Therefore it is hard for me to ask you to put the brakes on NPS-AINL Preferred Option #2 and redesign or modify that option. In my opinion, AINL- Preferred Option #2 at this time is at being driven at warp speed, and not a good fit and/or option overall.

Since NPS-AINL offers four basic, "written in stone" blueprints with seemingly very little wiggle room before the final draft, I am personally obligated to support that the GMP- Alternative Option #1.of the NPS-AINL General Management Plan.

In closing, the canvassers of the DGMP review team will hopefully receive my comments of the draft GMP in a positive light and view it as constructive criticism. My father, a 1960's shaker and mover of the AINL park movement and, like myself, a continued supporter of AINL told me once, "he who has the heart to criticize, should have the heart to help". (715) 779-5283

Respectfully Submitted,



Robert J. Nelson

Citizen at large

10/12/09

Greg Jarvis  
Apostle Islands National Lakeshore  
General Management Plan  
NPS Denver Service Center  
P.O. Box 25287  
Denver CO 80225

Dear Mr. Jarvis,

My name is Carl Brooks, I live on Madeline Island and I am a frequent user of the Apostle Islands National Lakeshore since 1991. I grew up in the Park Service, my father was Myrl Brooks a career NPS employee And the project manager and first superintendent of Voyageurs National Park.

I have read the draft management plan and I am very concerned with the direction the current lakeshore manager is trying to take. As a matter of fact there seems to be a real push to restrict use of the area to kayakers and wilderness backpackers. This was not the intent in the original master plan and is not why the Apostle Island Lakeshore has been such a success. The present multiple use of the resource serves all visitors and residents. To restrict use of the area to one small group will have an adverse effect on the local economy and not service the majority of the people who use the lakeshore and that majority are taxpayers to.

I also believe that the current management is not doing all it could to maintain the existing assets of the lakeshore. ie, the docks at Sand Bay and building on Sand Island. Also I believe closing the visitor center at Sand Bay and moving it to Meters Beach only to serve kayakers is short sighted and will not serve the majority of the uses of the area.

Please if it isn't broken don't fix it. The Apostle Islands Lakeshore is perfect just the way it is. It serves the public, all the public, very well. It is user friendly, please don't let the few rule the majority.

Thank You  
Respectfully

Carl T. Brooks  
PO Box 125  
La Point Wi. 54850



**Spencer L. Robnik, M.D.**

37431 Apostle Bay Road  
Bayfield, Wisconsin 54814-4418

34

October 21, 2009

Apostle Islands National Lakeshore General Management Plan  
National Park Service  
Denver Service Center -- Greg Jarvis  
PO Box 25287  
Denver, CO 80225

Dear Mr. Jarvis,

I have read portions of the General Management Plan for the Apostle Islands National Lakeshore and a copy of the letter dated October 20, 2009 sent to you by Mr. Jerry Phillips, President of the Bayfield Heritage Association. I concur fully in his concerns relating to the transfer of archives and artifacts to an inaccessible site far from their historic origins.

I have also spoken with a number of Bayfield citizens, some in their 90's, whose families donated cherished family photographs and other artifacts, which were an important part of the areas history, to the National Park Service before the Bayfield Heritage Association's Heritage Center Museum and Research facility was constructed. They felt assured that with the establishment the Apostle Islands National Headquarters in Bayfield, Wisconsin their donations would always be available locally for review and research by local citizens and organizations. These individuals now feel betrayed by the NPS because it is most likely that if the items are removed from the area to the upper peninsula of Michigan local residents will never have access to them and the NPS will not utilize them for educational and research purposes as local entities and individuals would. A portion of local history will be lost forever.

My appeal to you is to request the revision the General Management Plan to allow established local historical entities to acquire and accession archives and artifacts donated to the NPS by Bayfield area individuals and organizations so that they will remain and be preserved locally for educational and research purposes. It would seem that if the NPS has no use for the items other than to put them in storage in a remote holding facility that transfer of the items to local established historical entities where they would be preserved and utilized would be the most logical alternative.

Thank you for your help in assuring that local historical archives and artifacts will remain in their locale of origin.

Sincerely,



Spencer L. Robnik M.D., FACR

Cc: Congressman David Obey, State Assemblyman Gary Sherman and Superintendent Bob Krumenaker

Mr. Greg Jarvis  
 Project Leader  
 Apostle Islands National Lakeshore General Management Plan  
 National Park Service – Denver Service Center  
 P.O. Box 25257  
 Denver, Colorado 80225

Dear Mr. Jarvis,

I am among the fifth generation descendants of Apostle Islands Historic Use Families and I have lived and worked in the Apostle Islands during the summers of nearly seventy years.

I can attest to the incredible history that The Apostle Islands Lakeshore has to share: Geologic history, natural history, commercial history, and cultural history. For many of the current visitors – *the history is the draw!* It isn't just the spectacular wilderness or the water for boaters.

When visitors arrive they begin asking questions. Of course there are excellent guidebooks and many visitors come armed with guidebooks. The books are filled with excellent historic pictures – many provided by the Park Service. But visitors ask: "Where is that building?" The guidebooks are filled with historic information again supplied by the Park Service or the Historic Use Families. Still the visitors ask questions – and if there are answers available – the visits are made all that more memorable, educational and enjoyable. Sometimes I am available when visitors ask questions. People say: "Let's ask Peter. He has been around here for a long time." Often, I have the answer, or, I know exactly where in the guidebook, the precise history can be found.

Once I was silently taking the tour of the Sand Island Lighthouse when a visitor asked: "How did they get the water up here?" The guide said; "I've been told there was a cistern, but I've yet to find it." I said to the guide: "Excuse me, but I know where the cistern is." I led them to the back of the kitchen, pulled away the rug, and opened the hatch door to the cistern. The Apostle Islands Park Service needs to join with the Historic Use Families as the Service has in other parts of the country to make all this history available to the visiting public who pay for the Park's existence and want to know the whole true history.

The draft plan refers to the use of partnerships. It also suggests that the Park Service Staff would attempt to maintain the life estate properties upon the expiration of their respective terms. The use of partnerships with Historic Use Families is desirable and attainable. The use of Park Service staff to maintain and interpret the life estate properties is neither practical nor desirable. As I can attest to, first hand, preserving these old buildings and their history is a time-intensive, expensive task – especially on an island with no vehicles and no electricity. Given the staffing and funding challenges the Park Service confronts, I see no way these historically significant properties can be maintained solely by agency personnel. In addition, who better to assist in that role than the very families who represent the history that the Park Service is duty-bound to protect?

I request that the final plan recognize the high value of partnerships with community organizations and the families and individuals who have lived the history of the Apostle Islands.

Sincerely,

A handwritten signature in black ink, reading "Peter F. Jensch". The signature is fluid and cursive, with the first name "Peter" and last name "Jensch" clearly legible.

Peter F. Jensch  
8325 SW Mohawk No.183  
Tualatin, Oregon 97062

P.O. Box 84  
Bayfield, WI 54814  
October 21, 2009

Mr. Greg Jarvis  
Apostle Islands National Lakeshore – GMP  
National Park Service  
Denver Service Center  
P.O. Box 25287  
Denver, CO 80225

Dear Mr. Jarvis:

I am writing to comment on the draft general management plan for the Apostle Islands National Lakeshore.

For my entire life, I have had close personal ties to the Islands and the local area. My family maintains rights to the historic Campbell cottage on Sand Island. We are now in the sixth generation of family members to be associated with this property, which we lovingly care for with the expenditure of considerable hard work, time, and money. Today this property is much the same as it was 100 years ago when it was built by my ancestors. My family also formerly owned property at Little Sand Bay, the rights to which have expired. I use many of the opportunities that the park presents for appreciating and protecting the environment, learning about and preserving the deep and rich history of the Islands, and enjoying a wide variety of recreational experiences. I am actively involved in the local community, where many of my family members and close friends live. The Lakeshore is integral to this community, and the future plans for its management affect many people. My comments are submitted on the basis of this strong personal association with the Islands, the local community, and the people who live here.

I am pleased that the draft plan recognizes the importance of preserving the history of the Lakeshore. In the final plan, I urge the Park Service to emphasize that this responsibility entails more than preserving old buildings and landscapes. It also calls for maintaining the links with the past that continue to exist today through the people of the local community and Island families. I have visited locations in the Lakeshore that once served as the homes of farmers, fishermen, craftsmen, and seasonal visitors. Many of the buildings that used to occupy these sites have been removed; some still exist but are in decline; and some have been preserved. All of these locations, no matter what their state of repair, have lost their connections with the past. The spirit, energy, and historical context were lost when the linkage to the historic occupants was broken. The Lakeshore will be so much better off in terms of preserving, for the public interest, the architectural, human, and cultural history that so significantly defines the Islands if the people who have lived along their shores, fished their waters, farmed their lands, built and maintained their buildings, operated their lighthouses, and experienced their beauty on a continuous basis are included as management partners.

I believe that the Park Service has a unique opportunity at the Lakeshore to build a bridge from the past to the future that is more than interpretative signs, brochures, and lectures. As

important as those elements of the Lakeshore are, and as magnificently as they are carried out by the dedicated and under-appreciated Lakeshore staff, they are no substitute for maintaining the continuity with the people who have lived the Island history for generations and continue to do so today. These people, including my family, have offered to play such a role, both individually and through organizations they participate in and have created. I strongly urge the Park Service to take advantage of this opportunity through the final plan. If such a cooperative future path to preserving and interpreting the past cannot be established for the Apostle Islands, the future of the Lakeshore will be far less promising and a fabulous opportunity to serve as an example of management creativity and efficiency will be lost.

Thank you for considering these comments.

Sincerely,

A handwritten signature in cursive script that reads "Phebe Campbell Jensch". The signature is written in dark ink and is positioned above the printed name.

Phebe Campbell Jensch

**Lawrence Newman**  
**65526 Lake Park Rd**  
**Ashland, WI 54806**

**Apostle Islands National Lakeshore**  
**General Management Plan**  
**National Park Service**  
**Denver Service Center- P. Greg Jarvis**  
**P.O. Box 287**  
**Denver, CO 80225**

**To Whom It May Concern:**

**I am firmly opposed to the Park Service's proposed plan to move the camping sites currently situated along Presque Isle Bay on Stockton Island. The current sites are now very convenient for senior citizens, such as myself, for the transport of camping equipment and supplies.**

**I am planning a camping trip in 2010 to the Presque Isle sites with my son and young grandchildren. It would be a strenuous effort on my behalf to transport a portion of our needed supplies to a distant site. The national park system should not be established for the usage of just those people who are younger and physically capable of hiking to distant campsites. If the service's goal is to make the park system more accessible to all citizens, the proposed movement of these campsites is a big step backwards.**

**Sincerely,**

A handwritten signature in black ink, appearing to read 'Lawrence Newman', with a stylized, flowing script.

**Lawrence Newman**

**c:Apostle Islands National Lakeshore**  
**415 Washington Avenue\**  
**Bayfield, WI 54814**

September 12, 2009

38

Apostle Islands National Lakeshore  
General Management Plan  
National Park Service  
Denver Service Center – P, Greg Jarvis  
P.O. Box 25287  
Denver, CO 80225

Dear Mr. Jarvis,

I have reviewed the draft plan for the Apostle Islands. I am enclosing my letter to the Secretary of Interior who just visited here. This is my comment on the Plan. The Plan does nothing to address these problems. It also is completely unrealistic by saying the Park Service will maintain everything, including docks and buildings not even under its control now. This will not happen, and the Park will continue to go downhill while people will get pushed out. The Park Service needs to work better with others who want to help and stop putting its own interest first. The Park Service also seems to be trying to limit use by boaters, except kayakers. The Plan proposes to shut the visitor center at Little Sand Bay, a power and sail boat center, and move it to the Myers Road, a kayak spot. Combined with the failure to repair the Little Sand Bay docks, replace cleats on Devils Island, and the Superintendent's own rule to prohibit motorized access across the ice, which was never reviewed by the public, there is a clear trend to make this whole Park a wilderness. This Park needs to be a part of the area and its people, not above them. I hope your next plan gets real.

Sincerely Yours,



Chris Hudachek  
85850 Stage Road  
Cornucopia, Wisconsin, 54827

September 10, 2009

Ken Salazar  
Secretary of Interior  
Room 6156  
1849 C Street  
District of Columbia 20240

Dear Mr. Salazar:

I read in the Ashland Daily Press about your recent visit to the Apostle Islands. Thank you for your interest in this park. It is rapidly going downhill. The local Park Service does not seem to care about the interests of local residents or boaters. Access to docks is getting more and more difficult. The Park Service cannot maintain facilities, and yet it does not seek help from others. It spends lots of money on new boats and equipment for itself and its employees. They seem to get everything they want, but boaters and park users get the short end. I hope you can direct the Park Service to be a part of the local area, not at odds with it. Thank you.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Chris Hudachek", with a stylized, flowing script.

Chris Hudachek  
85850 Stage Road  
Cornucopia, Wisconsin, 54827

cc: Congressman Obey

**Robert J. Dunne Jr.**  
**1615 10<sup>th</sup> Ave West**  
**Ashland, WI 54806**

Ph 715 682 0111  
dunnes@centurytel.net

Apostle Islands National Lakeshore -- GMP  
National Park Service  
Denver Service Center -- P. Greg Jarvis  
P.O. 25287  
Denver, CO 80225

September 18, 2009

Dear Mr. Jarvis,

Comments re: the Apostle Islands National Lakeshore General Management Plan

I'm a member of the Friends of the Apostle Islands National Lakeshore, a 501c3, and it's Treasurer. I'm therefore acutely aware that the AINLS already strains to maintain it's present facilities and historic structures.

My comments relate to:

- 1) the need for, and location of, a new NPS Visitor Centers on the mainland
- 2) visitor access to the Islands.

The Parks present visitor center in Bayfield does not compare well to visitor centers at other National Parks or Monuments, it's minimal in scope, not always "open" and poorly located vis a vis the Lake. I agree an enhanced Visitor Center is needed.

The AINLS is a Partner i.e. already has a considerable initial and re-occurring investment in the Northern Great Lakes Visitor Center. **Annual operating costs are shared with other Partners.**

As I see it the AINL under utilizes the NGLVC, it doesn't get a good bounce for it's buck! Why not take greater advantage of this proprietary facility? Why add to long term overhead and associated staffing/maintenance costs associated with a "go it alone" new center in Bayfield?

The NGLVC is optimally located at the gate way to Bayfield County and the AINLS. The number of visitors thereto FAR exceeds those who visit the Park's undersized, under visited, tucked away Bayfield Visitor Center. The NGLVC is strategically located, attracts more traffic, and it's well staffed - **all the time**. It provides a view of the Lake,

via the observation tower, and has outstanding historical, geological and ecological exhibits.

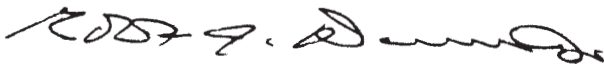
Why duplicate facilities? Why waste precious capital dollars and duplicate long term operating costs by building a new center in Bayfield. I believe the Park's budget would be better served by utilizing its present investment. Assigning skilled Park Service interpretive staff to the NGLVC, and ramping up informational exhibits, would be more cost effective and would provide a better service to the public.

Assess to the Islands is expensive unless you go by Kayak or private boat – Yachts for the well healed. Most visitors, regrettably, only view the Islands from shore. Few families can afford the trip out to the islands. It would be terrific if the less affluent tax paying general public could have a more economical option **i.e. via government subsidized access to the islands**: provided via private contractor/vendors or, if possible, by Park Service water craft.

Providing economical access should be made part of the Plan.

The comments herein are mine, and not to be interpreted as coming from a spokesman for the Friends of the Apostle Islands.

Sincerely,



Robert J. Dunne Jr.  
& Sondra R. Dunne

C: Superintendent  
AINLS  
415 Washington Ave.  
Bayfield, WI 54814

September 6, 2009

N8348 Trinity Road  
Phillips, WI 54555

Apostle Islands National Lakeshore General Management Plan  
National Park Service  
Denver Service Center – P, Greg Jarvis  
P.O. Box 25287  
Denver, CO 80225

41

Dear Mr. Jarvis,

Thank you for the opportunity to comment on the Apostle Islands National Lakeshore's General Management Plan. My comments focus on the planning issue "**Future of the Mainland NPS Visitor Centers**" (Page 49). This planning issue asks the questions:

1. Are the existing NPS visitor centers providing services effectively (orientation, interpretation, assistance)?
2. Are all of these visitor Centers needed?
3. Are they being used by visitors and meeting their needs?
4. Are there other possibilities for the operation of mainland visitor Centers?

**In response to question numbers one and four, the Park Service could dramatically increase its effectiveness in promoting the park and delivering orientation and interpretative services to its visitors by more effectively utilizing the Northern Great Lakes Visitor Center (NGLVC) facility and partnership.** The Park Service participated in the planning and development of the NGLVC facility and exhibits and is one of the four founding partners. This 37,000 square foot, \$7,000,000 facility opened in May of 1998. The Park Service financially supports and jointly operates the Center through a long standing partnership with the Forest Service, Fish and Wildlife Service, Wisconsin Historical Society, University of Wisconsin-Extension, and the Friends of the Center. In calendar year 2009, the Center's projected visitation will be in excess of 120,000 people.

As an alternative to building, staffing and maintaining a new visitor center in Bayfield (preferred alternative), I would suggest that a more cost effective approach to promoting the park and delivering orientation and interpretive services to visitors would be to leverage the Lakeshore's limited resources through the existing Center partnership for the following reasons:

1. The Northern Great Lakes Visitor Center gives the park access to an audience of more than of 120,000 visitors a year. Travelers on U.S. Highway 2 are only 22 miles from the park headquarters, yet many pass by, unaware of the park's existence. The Center is located strategically near the intersection of Highways 2 and 13, a perfect location to contact travelers on Highway 2 and direct them to the park.

The 60,306 Center visitation figure referenced in the GMP (page 207) is the number of visitors talked to (personal contacts) by the Center's front desk staff. This means over 55,000 potential visitors to the National Lakeshore are not contacted by any Center staff. This occurs, primarily, due to minimal front desk staffing at the Center. In addition, with visitation rates in excess of 750 visitors per day on busy summer weekends, contact time per visitor to orient and tell the National Lakeshore story is extremely limited.

2. In describing the Lakeshore's headquarter building in Bayfield, the GMP notes that there are no views of the islands or Lake Superior from this facility (Page 207). It should be noted that the NGLVC already offers panoramic views of Lake Superior and Long Island from its five story observation tower. The Center's tower, with its spectacular view of Lake Superior and Long Island and established high visitation, offers outstanding opportunities for orientation and interpretation of the National Lakeshore.
3. Currently, there are no Park Service interpretive staff located at the NGLVC. The Center has invested over \$1,000,000 of historical exhibits of the broader Northern Great Lakes region that could give context and perspective to the National Lakeshore stories and interpretive themes. Skilled Park Service interpreters could capitalize on this investment to achieve Park Service goals and objectives. Additionally, Park Service interpretive staff located at the Center could leverage their time and effort with other Center state and federal partner educators focusing on issues that transcend agency boundaries such as climate change, More Kids in the Woods, and invasive species.
4. Building and maintaining a new visitor Center in Bayfield will increase the park's long term fixed costs and reduce the park's budget and management flexibility in the future. Operating, staffing, and maintaining a new building will likely be a 30 to 50 year commitment. Those infrastructure investments have already been made at the NGLVC and maintenance and operating costs are shared through the multi-agency partnership. Additionally, the park is virtually guaranteed an audience in excess of 120,000 visitors per year. Adding an interpreter or front desk staff at the NGLVC would dramatically increase National Lakeshore's exposure, visitor contacts, orientation, and interpretation at a fraction of the cost of a new visitor Center and give the Lakeshore more budget and management flexibility in the future.

5. On page 50 of the GMP, a statement is made that that the NGLVC “partnership vies for funding with the rest of the park”. I agree with this statement. However, I don’t agree with conclusion drawn in the remainder of the sentence “therefore, the funding (for the Center) is not likely to increase beyond the current level”. If additional park investment in the NGLVC would clearly improve the cost effectiveness and efficiency of promoting the park and delivering visitor services over other alternatives, why wouldn’t the park make that investment?
6. Finally, on page 50 of the GMP, the statement is made “Although many tourists stop at the NGLVC, it is not clear how many park visitors use this facility”. As a point of clarification, by far and away the number one geographic area of interest of NGLVC visitors is the Apostle Islands, the Bayfield peninsula, the gateway community of Bayfield, and Lake Superior.

In summary, the Apostle Islands National Lakeshore has an incredible opportunity through the Northern Great Lakes Visitor Center to dramatically increase visitor contacts, direct visitors on U.S Highway 2 to the Lakeshore and its facilities and services, leverage its resources with other state and federal partners at the Center to deliver orientation and interpretive services while maintaining budget flexibility and reducing the need to invest in and maintain costly new infrastructure.

It should also be noted that, in addition to being a member of the Friends of Apostle Islands National Lakeshore, I am also the soon to be retired, Director of the Northern Great Lakes Visitor Center. Although of these comments could be construed to promote the NGLVC, I strongly believe they are in the best interest of the park. As Director of the Center, I have always strived to use the Center and the partnership to create value for our Center partner members. I offer these comments and suggestions to the draft General Master Plan in that spirit.

Thank you for the opportunity to comment.

Sincerely,

  
Steven Hoecker

cc Bob Krumenaker, Apostle Islands National Lakeshore

From: Peg Dollinger, Bayfield, WI

To: National Park Service

Re: Apostle Islands /NPS Preferred Alternative

Date: 10/12/09

"The park would continue to look and feel much the way it does today." This reassuring sentence is from the introduction to the Summary of the NPS Preferred Alternative to the General Management Plan. The only problem is that it is misleading! Some radical changes are, indeed, included in the plan. Here's my take on several of the proposed changes and other items I feel need to be addressed.

1. Relocating the Presque Isle campsites to the wooded area south of the dock complex, would be, in my opinion, a big mistake...a tragedy! These are the showcase campsites in the entire park. They're located on a sandy beach on a beautiful bay where campers can swim, walk the shoreline, visit the Ranger Station, hike to Julian Bay, hike the Tombolo Trail, etc., etc. To relocate these sites to the wooded area with no beach south of the boat complex would truly take away from the "wilderness experience" mentioned in the Summary as a primary goal of the Park Service.

I realize the site is fragile, but I've been visiting Stockton Island for 25 years, and feel the erosion control methods have been effective. Maybe more could be done? For example, a few of the sites could be eliminated to provide common beach access areas. Perhaps several more rope steps to access the beach could be built along with more fencing to protect the banks? What about more visitor education regarding erosion prevention?

I also understand that one of the reasons for considering closing this camping area is that some rock shards, possibly associated with ancient native inhabitants, have been found in the area (not sure if it's the Presque Isle campsite or Quarry Bay). Couldn't these sensitive areas simply be fenced off to protect them for future digs? Also, it seems to me these dig sites might provide an excellent opportunity for the Interpretive staff to develop some material/activities to share with visitors.

2. I feel the same about the proposed relocation of the Oak Island group site. These campsites were developed years ago on that wonderful spot above the sand spit for a very good reason: It's the best location on the island! The beach gives excellent access for kayaks and other small boats. The site is spacious, south facing, great for beach walking, swimming, etc. etc. The bottom line, as I see it, is that it's a magical place to camp...very much superior to the proposed site near the dock. To move the group site closer to the dock and ranger cabin, an area with almost no beach and a sometimes busy dock (one that's posted "no swimming") would be very poor long-range planning and a big waste of money.
3. Little Sand Bay Harbor: Boaters need another safe harbor in the Park with at least 5-6 feet of depth. Currently, Presque Isle is the only other safe harbor and is limited to only seven or eight boats, depending on length. It's usually packed during the short summer season. This puts most

boaters on a hook (vulnerable to wind/weather changes) in Presque Isle or Julian Bay. Boaters, especially those with young children, should have another safe harbor option. Little Sand Bay has much to offer park visitors, both those that come by car and by boat. Why not dredge that harbor and provide docking for five or six boats?

4. The East Bay dock on Sand Island is accessible only to shallow draft boats. Dredging needs to be done and the dock should be lengthened.
5. Both Otter and South Twin docks are in bad shape. They need extensive crib structure work and extension. The small harbor on the southern tip of Devil's Island is "almost" a safe harbor, but the entrance is treacherous because of huge boulders just a few feet below the surface and within the harbor as well. As climate change unfolds, we're going to see lower lake levels. Why not stay on top of the situation by proactively maintaining docks and performing needed dredging? I think maintenance of docks should be at the top of the list.
6. The Long Island dock has collapsed; it needs to be rebuilt, especially since Long Island is the closest, most accessible island for folks from Ashland, Washburn, Bayfield and Madeline Island. Many boaters enjoy visiting Long Island because it's so close, thereby saving fuel. A deep- water dock would provide safe access for both sail and power boaters.
7. The across-the-island hiking trail on Rocky Island is in rough shape. The eroded overlook is downright dangerous! The trail on Otter Island is overgrown with maples, again a shame as I believe it's the only trail on the island.

#### Other Concerns:

1. Encouraging affordable public transportation to the islands is an excellent idea. The Park is under-visited and the current shuttle to Stockton is too expensive and doesn't allow visitors enough time on the island. When you consider it costs an adult almost \$42 for the round trip that doesn't allow enough time for much more than a short walk to Julian Bay and a quick picnic. No wonder few non-boating visitors actually set foot in the Park! Yes, a cheaper way for folks to get to the islands would be a great improvement.
2. I don't think a new visitor center near the Bayfield waterfront is a wise expenditure. The Park already has a presence at the Northern Great Lakes Visitor Center and most people who come to Bayfield to visit the islands either launch their boats at the Bayfield city dock, Red Cliff, Washburn, Meyer's Beach or Little Sand Bay. Then off they go to the islands. These boaters, along with the thousands of individuals with boats at marinas stretching from Ashland to Cornucopia, Madeline Island, Duluth-Superior, Silver Bay, Thunder Bay, etc., head out for the islands to experience the big lake and the islands directly. I suppose a new visitor center on the Bayfield waterfront would be a convenient spot for campers to pick up their permits. First-time boaters would also find it handy for picking up brochures and maps. I have one concern, though. The Visitor Center must be staffed by experienced, knowledgeable people. This would not be the best place for inexperienced high school students with little first-hand knowledge of the

islands. Non-boating visitors would probably enjoy watching another video on a rainy day and the lighthouse display is interesting, but, all-in-all, it seems to me that it's hard to justify the expense of continuing to operate the current (very beautiful ) old county courthouse building as well as a new visitor center in town. I know the current building hosts quite a few visitors during the tourist season, but in the winter months there are no visitors. I can't imagine the cost involved in staffing a new visitor center in downtown Bayfield during the off-season months. It seems like a very unwise plan, unless, of course, extravagant spending is no problem. When I think about the infrastructure work that needs to be done in the islands and at Little Sand Bay, I shake my head in disbelief. It really makes me wonder how much of the Park's budget is targeted towards peripheral projects rather than the important work of increasing access to a National Park with one of the lowest visitor rates in the country.

*Respectfully Submitted,  
Peg Dallingier  
P.O. box 1535  
Bayfield, WI 54814*

Charles Brummer  
P.O. Box 67  
La Pointe, WI 54850  
715-747-6464

October 13, 2009

Greg Jarvis  
Apostle Islands National Lakeshore  
General Management Plan  
National Park Service  
Denver Service Center  
P.O. Box 25287  
Denver CO 80225

Dear Mr. Jarvis,

I have been fortunate enough to have lived my entire life on Madeline Island, one of the Apostle Islands. For obvious reasons, I have used the Apostle Islands National Lakeshore for many recreational activities. I have read the draft management plan and understand that this is my opportunity to provide public feedback.

I encourage the park service to continue using the old Bayfield courthouse as its headquarters. I have visited this grand building many times for reference materials (books, maps, historical items) and find it both user friendly and centrally located. All historical artifacts must remain here and I oppose any plans to move these important items out of the Bayfield region.

I strongly believe that the park should be shared and enjoyed by all visitors. Preference in the plan seems to be given to hikers and kayakers over power boaters. I also feel that winter access to the Islands via snowmobile or vehicle should remain an important option for visitors to view and enjoy the Apostle Islands (as long as they do not drive on any of the Islands).

I oppose shifting the current visitor center at Little Sand Bay to Meyers Road. I would rather see improvements made to the dock at Little Sand Bay and all island docks. This would encourage use by more boaters, enhancing the enjoyment of the Park by more Americans

I would encourage park service personnel to work with local organizations whom could assist in maintaining buildings and property in the Apostle Islands. There are many talented people in the Bayfield region who would gladly volunteer to help maintain the legacy of the Islands. Such dedication would hopefully be passed down to younger generations. While lighthouse stations get the majority of attention (and rightfully so) other buildings on Rocky, South Twin, Manitou and Sand Island need rehabilitation which may only occur if help is accepted from outside the Park Service.

Please do not turn away willing and able hands. The current Park Superintendent seems to be more concerned with eliminating people and certain structures from the equation of Apostle Islands history rather than embracing these accomplishments. Local individuals who lived and worked on the Islands as fishermen, loggers, quarrymen and lighthouse keepers should not be forgotten for their contributions to the history of the Islands.

Thank you so much for allowing public feedback to the proposed general management plan. I think you will find most people who live in the Apostle Islands vicinity want proper management of the islands for future generations to enjoy. However, please do not go overboard on restricting access or use of the Islands. Making it difficult for the public to visit the Apostle Islands should not be embraced as part of the management plan. Not everyone can kayak or canoe to the islands, nor can everyone afford to pay for exclusive vendor transportation services. Every American should be allowed to enjoy the Apostle Islands as long as they are respectful of the natural resources.

Good luck with this management plan. Madeline Island and the Apostle Islands will always be part of my life.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Charles Brummer".

Charles Brummer

October 15, 2009

44

Greg Jarvis  
Apostle Islands National Lakeshore  
General Management Plan  
National Park Service  
Denver Service Center  
P.O. Box 25287  
Denver CO 80225

Dear Mr. Jarvis:

After looking over the proposed management plan for the Apostle Islands National Lakeshore, I am compelled to make a few comments on it. I feel I am qualified to make these comments since I have lived on Madeline Island (one of the Apostle Islands) my entire life.

In general it appears that "quiet sports" such as kayakers are favored over other recreational activities such as power boats and (if conditions permit) snowmobiles. I have nothing against kayakers however I feel that the park should try to accommodate all users including power boaters. Please keep the visitor center at Little Sand Bay open, and try to improve the dock at Little Sand Bay, that way everyone--Kayakers and Power Boaters--will be served.

Please don't move the Park Headquarters out of the old Bayfield County Courthouse. It is a beautiful Building made out of brown-stone from the Apostle Islands, and that alone should make it fit for use as a Headquarters for the Apostle Island National Lakeshore. It would be a shame for it to lie fallow.

Please try and do a better job of preserving and maintaining the historical structures on the Apostle Islands. I know funding can be difficult to obtain, however the structures (not to mention the people that built and used them) are part of the reason visitors come to the park. This fact is sometimes overlooked by the Park Superintendent.

Thank you for your time.

Sincerely,



Paul Brummer  
P.O. Box 67  
La Pointe, WI 54850

Dana Gust Carr  
4830 Brandywine St NW  
Washington DC 20016

Gregory Jarvis, Project Leader  
Apostle Islands Management Plan  
Denver Service Center  
National Park Service  
Box 25287  
Denver, CO 80225

Greetings Mr. Jarvis,

I am writing to express concerns that I have regarding the Apostle Islands and the future of the historic buildings that have been cared for by the families of Islanders for decades. I have written in the past to express some of these same concerns. I have visited the Apostle Islands many times and have donated money to the Friends of the Apostle Islands. I have been very impressed with the involvement of the families there in preserving the integrity and the historical value of the islands. They hold extreme high regard for the heritage, the buildings, and the stories that come out of this exceptionally wonderful part of our country. It is this history and the passion and the knowledge that makes this Park special.

I truly believe that the Park Service should make it their top priority to preserve this history on the islands. And, the way to do that is to work with the families who know and love and honor that property. The families there want to be a part of the heritage and to continue to honor and pass on the story. You couldn't ask for anything greater than that. It's a gift that sits in your lap waiting to be opened.

Thanks for your attention to this issue. I would like to be included on any notices regarding the Park or any information you might have on your plan for the Islands. I am not sure whether I have received anything since my last letter to you.

Sincerely,

  
Dana Gust Carr

**RECEIVED**

**OCT 27 2009**

**DSC-P**

October 22, 2009

46

Mr. Greg Jarvis  
Apostle Islands National Lakeshore  
General Management Plan  
National Park Service  
Denver Service Center  
P.O. Box 25287  
Denver, CO 80225

Dear Mr. Jarvis:

As a former worker at Shaw Point on Sand Island, I am writing to give you my views on the draft park plan. I want you to understand how difficult it is to maintain and care for the buildings on the Islands. They need to be saved, and I do not see how the Park Service can ever do all of this work. Your plan should recognize this reality and plan for either allowing the families and people who have cared for these buildings for years and years to do it, or admit that they will not be cared for and eventually deteriorate. You have many good people to work with. I suggest that the Park Service do so.

Yours truly,



Milan Horak  
226 S. 3rd. Avenue  
Bayport, Minn. 55003

**RECEIVED**

**OCT 27 2009**

**DSC-P**

Mr. Greg Jarvis, Project Leader  
Apostle Islands National Lakeshore  
General Management Plan  
National Park Service  
Denver Service Center  
PO Box 25287  
Denver, CO 80225

Dear Mr. Jarvis,

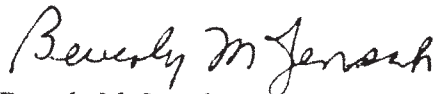
I welcome the opportunity to add my observations to the proposed General Management plan.

The proposed plan supports efforts to save area human history and historical buildings. That is a welcome change of direction. There are organizations ready to help, as well as competent carpenters and builders within the Bay area.

Yet the plan wants to downgrade the long history of Little Sand Bay by replacing the present Visitor Center with a meager kiosk, or contact station. Removal of finger docks 2 years ago has already limited the use of the area, much to the dismay of many park visitors. Perhaps the Park does not realize the Little Sand Bay area and dock have for more than 75 years provided storm shelter and overnight docking as well as the take-off point for fishing boats and smaller craft to head for the large western portion of the islands. This includes Raspberry and Sand islands, the most often visited islands, each bearing a lighthouse. Maybe LSB needs more, not less.

For years in-holders have been told that when their agreed upon time of use is up their beloved and cared for cottages will go up in smoke because the Park has no funds to care for them. So Funds to build a new visitor's center takes precedence over saving actual historical buildings and links to the past. Some parks welcome saving the human history by allowing owners to stay as long as they keep the buildings in good repair. My family would be happy to continue to keep our 1908 cottage and its related buildings in its present fine condition in return for allowing continued use. And the public funds could go to a visitor center.

Thank you for the opportunity to share observations and comments.



Beverly M. Jensch  
419 5<sup>th</sup> Ave E  
Washburn, WI 54814

October 22, 2009

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OCT 27 2009

10-23-09

Dear Mr. Jarvis,

**DSC-P**

I've just recently been shown a copy of the proposed plan for the alteration of Little Sand Bay; Town of Russell in Bayfield County. I have an interest in this appalling plan. I have been coming here, from Chicago, IL since 1948. My family has owned property at Sand Bay since the 1930's.

Although, the coming of the National Park, seemed to be a negative to us at the beginning, but now it has shown its positive side as to the preservation of the Lake Shore and surrounding Apostale Islands. It seems now to be losing its perspective of historical conservation.

The people involved in this plan, including the congressman Dave Obey, are relying on information given to them by people with very little or no knowledge of the area's history.

The Little Sand Bay Park Headquarters used to be the home of Herman and Agnes Johnson for more than 50 years; and by the way, their names are seldom mentioned publicly other than in some hidden archives tucked neatly away. Herman Johnson was one of the original pioneers coming from Sand Island. Where he was born and raised. I wonder how many historians knew that Hermie, as we all used to call him, was the first to establish what we now a days refer to as a convenience store. You couldn't go any farther north in Wisconsin to get a loaf of bread or milk, etc. Hermie was also a foremost commercial fisherman, and as far I know, was the only fisherman to take travelers from all around our country to show and educate them about the pond net (Pronounced "Pond") to Gill nets. People saw the hauling in of the catch all way to packing them on ice back at the dock.

Mr. Johnson did a lot more than fishing, running a store and gas station. Hermie's boat, the "Sand Bay" had a unique design unlike any other fishing boat in the area. It had an open bow with observation windows, and an open stern for the convenience of his passengers. The "Sand Bay" was also used in taking people to and from Sand Island. Hermie was also the only communication by two-way radio. We also used it in an emergency rescue. One late evening in 1955, an elderly woman had broken her back in a fall, and had to be hand carried down the long and steep staircase and put on his boat. Because of Hermie's radio the ambulance was waiting for our return.

It was sad to find out that most of the park personnel, who claim to know its history, could not identify the artifacts that Hermie recovered from the wreck of the "Sevonna" iron ore boat, sunk in 1905, off of Sand Island Point. Bill Neurauter, 2 scuba divers, myself, and Hermie Johnson hauled in the anchor. It took us over 4 hours to bring this huge, heavy piece of history; along with the anchor were a compass pedestal, steering helm and many other remains.


As you people deem it so necessary to remove and destroy that part of our history will never be able to be told to our future generations. Remember, there is no replacement of a lifetime of history, once it's removed monetary achievement does not accomplish in this case. The preservation and wildlife of the area known as Little Sand Bay! This plan goes against everything our National Park Service is supposed to represent!

The fact that kayakers and backpackers dictate how and where this area should be transferred makes no sense at all. And why do museum artifacts need to be removed from its location where it was originally brought to by the recipient, Hermie Johnson?

A lifetime of history will not go by unchallenged. Please reply to this letter. Being a Vietnam War Veteran, I know what it means to fight! I realize about the chain of command so please inform me to whom I must go to as to rectify this situation. In the event your "hands may become tied!"

Please take this to heart and do not destroy, or transfer any memorabilia from its original location. It belongs here!! Remember there is no replacement of history once it is removed.

Thank you,

  
Larry Bychowski

c.c.  
Congressman Obey

October 23, 2009

Kristin Connell  
PO Box 526  
84800 Lakeshore Drive  
Bayfield, WI- 54814

National Park Service  
Denver Service Center  
Attn. Greg Jarvis  
P.O. Box 25287  
Denver, CO 80225

RECEIVED

OCT 27 2009

DSC-P

Dear Mr. Jarvis,

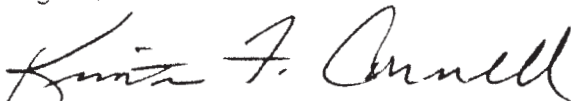
Thank you for the opportunity to enter input into the Apostle Island National Lakeshore General Management planning process. I would like to share some thoughts. I am formerly Kristin Edwards, granddaughter of Olaf and Jennie Johnson-Edwards, of early Bayfield business and commercial fishing background. I am a nursing instructor at Wisconsin Indianhead Technical College- Ashland, Wisconsin and a past board member of Bayfield Heritage Association. I have been a strong supporter of Apostle Islands National Lakeshore for many years.

Regrettably, I do go on record at this time as not supporting the park's Preferred Option number two, and ask you to defer to your preference to Option Number One that means basically no changes should be made to park's operational direction at all. The \$27.7 million dollar cost to build new properties when the park already has everything it needs to be even more successful in place, is too high a price tag. Little Sand Bay already is a modern and outstanding resource, Meyers Beach is sufficient as is, and the Bayfield Courthouse that serves as the office site and visitor center while busy in the summer, like all park operations is very quiet in the winter. Make it work.

Option 2 would also allow big changes to happen too quickly. The park, by admittance, doesn't have the staff to begin necessary projects now, let alone add to the present work burden. However it is important to ensure Lighthouse restoration, improving Little Sand Bay facilities, and entering into partnership agreements that could be applied to the Fred Hansen property on Sand Island and life estate properties that may expire over the life 15-20 year life of this plan would work very well. The park plan shows little effort collaborate- instead of running from funding assistance and in-kind gestures, the park should be recruiting and not excluding groups who care as much as myself or more about the islands.

The park plan also calls for the removal of local artifacts to Michigan's Keweenaw Historic Park repository and doesn't allow for educational or interpretive opportunities in the Wilderness areas. As an educator and lover of local history, this action that did not taken into consideration the sentiments of the local community makes no sense and is a Federal Government/Park Service slap in the face to the community. Please do not let our valuable history be taken away from us! We have guarded it carefully and will continue to as it is our family's heritage.

Regards,



Kristin F. Connell.

October 22, 2009

Greg Jarvis  
Apostle Islands National Lakeshore  
General Management Plan  
National Park Service  
Denver Service Center  
P.O. Box 25287  
Denver, CO 80225

**RECEIVED**

**OCT 27 2009**

**DSC-P**

Dear Mr. Jarvis:

I am a resident of the Bayfield area, and I frequently use the Apostle Islands National Lakeshore for recreation, boating, and outdoor activities. I have reviewed the draft management plan and submit these comments.

I believe the proposed plan contains several actions that are not good for the park or this area. The plan appears to have been written without regard to the interests of the people who use the park. Instead, it has a narrow view based on the desires of the Park Service.

The plan does not support the wide range of public use that has occurred for decades. Kayakers and wilderness backpackers are favored over all other users, including campers at the Russell campground and power boaters. I oppose closing the visitor center at Little Sand Bay. Shifting this service to Meyers Road favors kayakers. I also object to the failure to improve docking facilities at Little Sand Bay and some of the Islands. This also keeps people out.

The plan says the Park Service will maintain everything if funds are available. We all know funds will not be available. I object to the failure of the plan to call for working with local people and groups to maintain buildings. It is hard to believe the Park Service has turned down volunteer help in the past and does not explain its plans for doing so in the future. Also, what is the point in not letting families who have property in the Park continue to maintain and use the places they have owned for over 100 years? Other parks do this, and the public still has rights to visit. It is much better to keep the long-time owners involved than to force them out and bring in volunteers and government employees with no ties and who cannot maintain them. These families are part of the history of the islands. Making them leave destroys that history.

I am opposed to moving out of the courthouse headquarters. The Park Service has always been there, and using it for a headquarters is a good purpose for that historic building. It is also good for the City of Bayfield. How much will it cost to move? And how much will it cost Bayfield to lose the rent of the courthouse? I also oppose the plan to ship away the items in the museum. They came from this area and should stay here.

Please make these changes to the plan so this park serves all the people. Thank you.

Sincerely, 

Leroy Dahlin  
P.O. Box 228  
LaPointe WI 54850

October 21, 2009

**RECEIVED**  
**OCT 27 2009**  
**DSC-P**

National Park Service  
Greg Jarvis  
Denver Service Center  
P.O. Box 25287  
Denver, CO 80225

Dear Mr. Jarvis,

In the GMP draft, the park proposes a lot of things. That plan spends way too much money for one. I read that you had a planning team to work with- how come no locals were involved? Shipping our history to Michigan is wrong- get that out of the plan. Fix what you have before you take more property off the tax role. None of the alternatives are good- preferred option # one is what is best for now.

Thanks,



Derald Barningham  
8 S. 7<sup>th</sup> Street  
Bayfield, Wis.

54814

Telephone 715-779-5051

Oct 22 2009

Mr. Greg Jarvis  
Apostle Islands National Lakeshore  
General Management Plan  
National Park Service  
Denver Service Center  
PO Box 25287  
Denver, CO. 80225

RECEIVED

OCT 27 2009

DSC-P

Dear Mr. Jarvis,

I am a frequent user of the Apostle Islands National Lakeshore, and I hereby submit my comments on the draft general management plan. I am very troubled by how unrealistic the plan is. It is surprising to me that the government would consider spending \$27 million on a new visitor center that is not needed, just because it is in the wrong location. Why spend money on a new center when other buildings are falling down. The Park

Service cannot even keep functioning docks at Little Sand Bay. Also, how does the Park Service think it can maintain the many historic building now under private control with its own staff? Everyone knows that it will not happen, those building will decline too! I sincerely hope that the final plan is more realistic and puts the priority on protecting what is already there. I also oppose the plan to ship away the items in the museum to the state of Michigan. The Park Service has eighteen boats, but only three rangers to police the area. That's almost one boat for every island.

Sincerely yours,  
Warren Jensch

Warren Jensch  
33215 St Hwy 13  
Bayfield, Wis.  
54814

October 22, 2009

Mr. Greg Jarvis  
Apostle Islands National Lakeshore GMP  
National Park Service  
Denver Service Center  
P.O. Box 25287  
Denver, CO 80225

**RECEIVED**

**OCT 27 2009**

**DSC-P**

Dear Mr. Jarvis:

Grocery shopping, packing clothes, filling coolers, driving two hours—all such not-fun and exhausting tasks, but when I'm required to do them for a trip to the Apostle Islands, the work doesn't get much better. Family outings to Sand Island are the highlight of summer, and if I'm lucky and the weather cooperates, also in spring and fall.

As far back as I can remember we have made the sometimes strenuous, but always worthwhile journey out to Sand Island. Nothing compares to getting in the "Whaler" and going on the fifteen-minute boat ride from Little Sand Bay across lovely Lake Superior out to "the lodge."

Every trip to the lodge includes a task for the betterment of the property. We are always working to repair and improve something: the roof, the floor, the porch, and so on. It's costly, but the building means so much to my family and me that every bit of energy and money is entirely worth it and we never regret our actions in conservation.

I have had the opportunity all throughout my life to experience the many things Lake Superior and, more specifically, The Apostle Islands have to offer. For this I am thankful. A lot of people have never had this chance.

Because the Sand Island Lodge, the lighthouses, and the other buildings located amongst the islands are crucial in preserving history and beauty, I couldn't agree more that they be a part of the National Lakeshore. Without the efforts of the National Park Service, who knows what shape the landmarks of the Apostle Islands would be in, or if they'd even be standing.

Maintaining buildings is not cheap by any means. It is very understandable that during these nationally tough economic times the Park Service would have to slightly cut back on the actions they can take in preservation and conservation.

This is where the Apostle Islands Historic Preservation Conservancy has helped my family. I feel glad they have offered their help.

Sincerely,



Jill Peters, a freshman at UW-Stevens Point

**RECEIVED**

**OCT 27 2009**

**DSC-P**

October 22, 2009

Mr. Greg Jarvis  
Apostle Islands National Lakeshore GMP  
National Park Service  
Denver Service Center  
P.O. Box 25287  
Denver, CO 80225

Dear Mr. Jarvis:

On behalf of my father, Howard Peters, and myself, I am respectfully submitting a brief comment letter concerning the Apostle Island's GMP.

I have literally grown up on Sand Island, where my Dad has owned land, and now holds a life-estate at the West Bay Lodge, and consider the place to be my real "home."

The influence of the tremendous natural and historical landscapes have helped define my love for nature and desire to preserve and protect all that encompasses the Apostle Islands National Lakeshore.

I personally take great pride in the work my family has done to maintain the "lodge," which was built almost 100 years ago from trees harvested and milled right on Sand Island.

However, I am not in the financial position to accomplish all that needs to be done to fully preserve the Adirondack-style lodge. The 2-story building can literally "absorb" time, energy and, of course, money.

Enter the Apostle Islands Historic Preservation Conservancy into this equation. They have really stepped up to the plate, and under the permission and guidance from officials at the Apostle Islands National Lakeshore, together we have made tremendous progress in our goals to preserve this fine structure.

Some of the completed projects include: a new dock, an extensive landscape project to drain water away from the foundation of the building, replacement of windows, chimney repair work, and other tasks that require extensive time and money.

I therefore hope that you seriously consider forming a meaningful and productive relationship between non-profit groups like the Apostle

October 22, 2009

National Park Service  
Denver Service Center  
Greg Jarvis  
P.O. Box 25257  
Denver, CO 80225

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**OCT 27 2009**

**DSC-P**

Dear Mr. Jarvis,

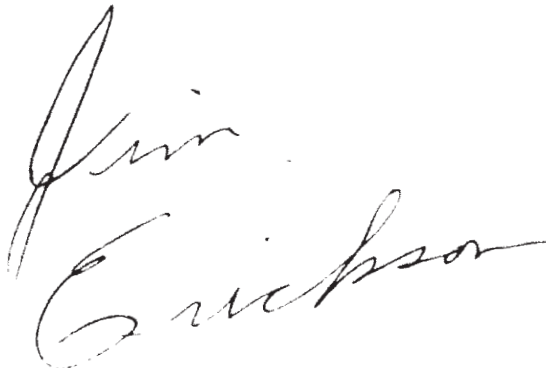
I am opposed to the National Park Service preferred option #2 in your General Management Plan Draft. No change- preferred option # 1 is what is best for now. The plan is too expensive and you need to take care of the properties you have already.

On page 205 you note that there is not adequate dock space- I agree. I am a retired commercial fisherman that spent my life in the islands and my family and I use the islands a lot. Fix and repair what you have before you build a new visitor center in Bayfield. Make sure that the Manitou and Sand Bay Fish camps are kept and used like they used to be and were intended to do.

Spend the time and money needed to make Fred Hanson's place on Sand Island a historic place. Maintain the place better. That's the northern most Norwegian farm in Wisconsin and has a lot of history and should be included in the GMP. That whole east side of the island should be a historic district.

Sincerely, ,

Jim Erickson  
88600  
Betzold Road  
Bayfield, Wis.  
54814

A handwritten signature in cursive script that reads "Jim Erickson". The signature is written in dark ink and is positioned to the right of the typed name and address.

October 23, 2009

Laurie Nourse Jr.  
85050 Trailer Court Road  
Bayfield, Wisconsin- 54814

**RECEIVED**

**OCT 26 2009**

**DSC-P**

National Park Service  
Denver Service Center  
Greg Jarvis  
P.O. Box 25287  
Denver, CO 80225

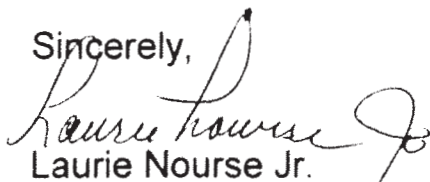
Dear Mr. Jarvis,

I am opposed to the National Park Service preferred option #2 in your General Management Plan Draft. No change- preferred option # 1 is what is best for now.

I own and operate a commercial trolling operation in Bayfield. There is not enough dock space in the islands. Maintain what few dock spaces you have now and build some more if necessary before you dump a lot of money on a new visitor center in Bayfield and Meyers beach. Replace the finger piers at Little Sand Bay that were left in the ice a couple years ago.

Take care of your property first and then go slow. Make sure that the Manitou and Little Sand Bay Fish camps are kept and used like they were intended to do. The plan is too expensive and you need to take care of the properties you have already.

Sincerely,

  
Laurie Nourse Jr.

October 19, 2009

**RECEIVED**  
**OCT 26 2009**  
**DSC-P**

Mr. Greg Jarvis  
Apostle Islands National Lakeshore  
General Management Plan  
National Park Service  
Denver Service Center  
P.O. Box 25287  
Denver, CO 80225

Dear National Park Service:

The draft plan for the Apostle Islands should be redone and reissued as a new draft for more comment. There seems to be very little in there that the people of the area want, and lots of what the Park Service officials have on their wish list. I vote for the no action alternative because that keeps things the way they are. If you get additional funds, spend them on fixing up what is already in the park and falling apart, not on new facilities and equipment. Thank you.

Sincerely,



Don Dau  
3081 Layton Ct. N.  
Lake Elmo, MN 55042

**Information for Comments on Apostle Islands  
Draft General Management Plan**

**Comments on the draft General Management Plan for the Apostle Islands National Lakeshore are due by October 23.**

Comments should be submitted to: Mr. Greg Jarvis, Project Leader, Apostle Islands National Lakeshore General Management Plan, National Park Service, Denver Service Center, PO Box 25257, Denver, CO 80225.

Comments also can be submitted online at <http://parkplanning.nps.gov/commentForm.cfm?parkID=115&projectID=10903&documentID=29061>

Access to the plan is available at <http://www.nps.gov/apis/upload/Alt%20Summary.pdf>.

**Anyone interested in the future of the Lakeshore, its historic buildings, and its relationship to the general community should comment, no matter how short the comment.**

Individuals should submit comments based on their personal feelings about the park.

Among the issues that are worth considering commenting on are:

1. Pleased that the plan places a strong emphasis on historic preservation
2. Pleased to see that the Park Service calls for the use of partnerships with other groups and volunteers to maintain historic properties. These general statements are the basis for future agreements.
3. Concerned that NPS suggests it can carry out historic preservation on its own. Non-profit groups like the Apostle Islands Historic Preservation Conservancy should be encouraged to help. Also, the historic use families who hold life estates should be allowed to maintain their traditional roles in preserving and managing these properties, as is done in many other national parks. These families are part of the history of the Islands and keeping them involved helps meet the Park Service duty to preserve the history of the Lakeshore.
4. Opposed to the closure of the visitor center at Little Sand Bay and the transfer of historic artifacts away from the Apostle Islands to a distant storage facility in Houghton, Michigan.
5. Concerned about the preferred alternative intention to spend significant funds on a new visitor center. This alternative would cost over \$27 million in one time funds (including other unspecified restoration actions at lighthouses and some other costs). Request that new facilities not be built until the existing structures in the park are taken care of. Protect what is already in existence before spending new money.
6. Work better with the public and local community to meet park needs and cultivate positive relationships.

## **Online Comments Related to Substantive Issues**

## Online Comments Related to Substantive Issues

ID	Correspondence	Receipt Date	Org.	Name, Address Email
9	<p>I strenuously object to the plan to close the 17 campsites along Stockton Island's beach and move them inland. The appeal of camping a highly visited island, is the chance to be along the lakeshore. The Apostle Islands are, after all, islands -- people visit them to be on the water. Moving the campsites inland completely desecrates the point of visiting this unique national park. If your concern truly is erosion then the park should educate visitors about their responsibilities to the landscape instead of taking away the opportunity to enjoy it.</p>	09/06/2009		<p>N/A, N/A .</p> <p>Minneapolis, MN 55409 USA</p>
10	<p>While I am in favor of increasing the public's access to enjoy the Apostle Islands National Lakeshore, I am opposed to any new development of infrastructure (buildings, electrical, water distribution, sewer, or other constructed facilities of any kind), on any and all of the islands which are included in the Park. I also do not favor restoration of any existing structures on any of the islands if those structures would then be used to attract a greater number of visitors to the islands, unless public access would be restricted to the immediate area surrounding the structures, and then for educational purposes only.</p> <p>I am in favor of refurbishing and restoring to original condition lighthouses which now exist on islands in the Park.</p> <p>The National Park Service should work to maintain the pristine nature of this wilderness area off the Northern shore of Wisconsin, in Lake Superior, not to reduce or degrade such pristine condition. I consider it more important to preserve the beauty of the area over increasing access or developing any public facilities.</p> <p>I am in favor of maintaining the present location of the campsites in the Park; not moving them away from the shoreline. The attractiveness of these campsites is part of the experience of camping close to the shore of Lake Superior, and moving them away from the shore would make the campsites less attractive and detract from the experience I believe they were intended to provide.</p> <p>My fear is over time gradual improvements to facilities or a gradual increase in the public's access to an uncontrolled condition would result in the complete degradation of the islands and the history of the region in the Lake Superior watershed.</p> <p>It is vitally important we work diligently to act as stewards of this region, and not allow its gradual demise in the name of public access.</p>	09/07/2009		<p>Kept Private Kept Private Duluth, MN 55806 USA Kept Private</p>

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11	<p>Comments of Greg Lais representing Wilderness Inquiry on the Apostle Islands National Lakeshore Draft General Management Plan / Wilderness Management Plan August 2009. Submitted September 9, 2009</p> <p>Overall, Wilderness Inquiry supports the preferred Alternative 2 plan, with a few modifications. These modifications include:</p> <p>1)More group and individual camping opportunities, both within</p> <p>the Gaylord Nelson Wilderness Area and outside of it. Alternative 2 states "no net gain" in campsites within the Wilderness Area. We would like to see as many camping and back country opportunities as possible.</p> <p>We are not concerned about the relocation of the group campsite on Oak Island, provided the replacement site is as accessible as possible for all persons, including persons with disabilities. We would like to see more group sites on Oak!</p> <p>2)More trails and hiking opportunities throughout the Apostle Islands.</p> <p>Since we can never guarantee that lake Superior will allow us to kayak, we are always looking for mainland activities for our groups. In general, we like the option of as many hiking trails as possible on the mainland.</p> <p>Specifically, we would like to see the trail from Meyers Beach extended all the way to Little Sand Bay. A primitive trail is fine (no bridges needed). One or two more primitive campsites along that trail would be ideal so we could have more school groups do backpacking.</p> <p>We are also interested in discussing trail options from our property adjacent to Little Sand Bay NPS lands to the lake and or going south through lands owned by the Red Cliff Band of the Ojibwe.</p> <p>3)NPS staffing continued, especially on the mainland at Little Sand Bay amd Meyers Beach.</p> <p>We agree that the building at Little Sand Bay should be replaced with a smaller ranger station, but would like to see that it continues to be staffed with an NPS seasonal or perhaps a volunteer. We are open to collaborating on that as we have discussed the option of having a seasonal caretaker stay at our cabin just ¼ of a mile from the ranger station.</p> <p>4)New visitor center located near the lake to bolster presence of the National Park Service in the community and provide important and interesting information on the Apostle Islands to visitors.</p>	09/08/2009	Wilderness Inquiry	<p>Lais, Gregory J. 808 - 14th Ave SE Minneapolis, MN 55414 USA greglais@wildernessinquiry.org</p>

ID	Correspondence	Receipt Date	Org.	Name, Address Email
	<p>We support the plan for the NPS to establish a new visitor center near the lake. The current HQ is up and away from where most of the pedestrian traffic is, and we believe there would be a much greater appreciation for the NPS and the Apostle Islands if a visitor center was closer to the "action". Our guess is that most visitors to Bayfield never go to the NPS headquarters because of its current location.</p> <p>We also think it is worth looking at the option of consolidating the headquarters into a new visitor center. We appreciate the opportunity to comment on this plan and to continue as partners with the National park Service. Wilderness Inquiry is also pleased to help the National Park Service comply with and exceed federal standards for accessibility of persons with disabilities. Wilderness Inquiry currently operates in over a dozen National Parks throughout the United States, and the Apostle Islands is one of the most naturally accessible parks in the entire system.</p> <p>Thank You!</p> <p>Greg Lais Executive Director Wilderness Inquiry 612-676-9409</p>			
14	<p>Concerning the Apostle Islands: I would hate to see the group campsite on Oak Island at the sand spit moved. I would hate to see the Rangers replaced by an information board at Little Sand Bay. They are such wonderful people to talk to.</p> <p>My wife and I kayak the islands all summer. We're only 120 miles away, so we get out quite often. Please keep it wild. Info center on the Bayfield water front sounds great! Pumping the outhouses out more often would be greatly appreciated. The out house at Sand Island Group site was completely filled to the bottom of the stainless steel tube on September 18th. P....U.....</p> <p>Please keep it wild. From my experience the people who use the Islands practice "Leave no Trace", which is a terrific thing. We were recently kayaking the Keweenaw Peninsula near the tip. We started at Bete Gris and paddled to the Montreal River. Our campsite was littered with used toilet paper all over the woods, booze bottles, and other junk. It was very sad! We've never experience such disregard in the Apostle Islands. Hats off to the people who enjoy this great treasure, and thank you to those concerned for making the Apostles what they are.</p>	09/24/2009		<p>Lueders, Paul A. 13837 Hwy 70 Lac du Flambeau, WI 54538 USA calypipe@hughes.net</p>

ID	Correspondence	Receipt Date	Org.	Name, Address Email
	Respectfully, Paul Lueders @ claypipe@hughes.net			
16	<p>I urge the Park Service to implement Option 3 of the Plan, which provides minor improvements for wilderness experiences but does not add more opportunities for transportation to the islands. One of the great aspects of the Apostle Islands is its uncrowded, wilderness character. I've enjoyed the islands even more because it took time paddling or sailing a small vessel to get to them. If more people would like to enjoy the islands, let them gain paddling or sailing or boating skills enable them to get there.</p> <p>I am opposed to Option 2 because I think increased ferrying of people to these wild islands would harm the Park's wilderness character. Please don't implement that Option.</p> <p>Thank you for your consideration. Gordon Gilbert</p>	10/08/2009		Gilbert, Gordon . 10714 N. Fairway Circle Mequon, WI 53092 USA gordon@financialwriti ng.net
19	<p>I am commenting on the Apostle Islands park plan. I do not agree with opening motor boat concessions on Basswood and Sand Islands. Individuals already have a hard time getting near island camp sites (as opposed to outside tour groups). These islands are already congested. All I have to do is look at the negative impact of concessionaires at other National Parks and it's clear that the commercialization and commodification of our National Parks is the WRONG way to go. The only reason that the Apostles have been named as one of our best National Park areas is that they have not yet been over-run by commercial interests posing as concerned conservators. The Chequamegon National Forest has been named one of the most endangered and mis-managed in the nation. We now want to extend that fiasco to the Apostles? Thank you for the opportunity to comment.</p>	10/13/2009		Liphart, Dennis S.  Washburn, WI 54891 USA
20	<p>The Oak Island group site (SE Sandspit) is the nicest group site in the entire park. It is well set up and doesn't seem to suffer from some of the same type of erosion that Stockton does. I use it when camping with other families out of our kayaks. I know it gets heavy use by local outfitters. I'd hate to see it moved to a "hike in" site further west. I look forward to an annual jaunt out to the sandspit and it is one of my favorite "family kayak friendly" spots in the world.</p> <p>I think that the Park Service needs to keep in mind that the park is a premier kayaking destination and needs to keep the needs of kayakers in mind when looking at plans or changes. Currently, there is heavy pressure on kayak friendly sites, and some competition between outfitters and private parties (mostly groups of friends or families that require a group site). The outfitters bring in tourists and safely introduce folks to kayaking, and therefore are really</p>	10/13/2009		Liphart, Doug . 24395 FR 245 Ashland, WI 54806 USA

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	<p>valuable in the equation. We should make sure that there are adequate sites to accommodate private parties as well.</p> <p>I am not opposed to adding motor shuttles to increase access to the islands for the general public. We do need to watch and make sure shuttles are affordable to avoid gentrification of our park user population. We also need to make sure that motor in private parties and kayakers are not negatively affected by those shuttle additions.</p> <p>Thanks!</p>			
21	<p>I believe the preferred plan does 3 main things that negatively effect kayakers.</p> <p>The first one is moving the Oak A (the group site on the sandspit) from its present spot, to a hike in site near the dock. The present site is probably the nicest group campsite in the park. The only reason for this change seems to be an arbitrary distinction that it is the only group campsite in the Gaylord Nelson Wilderness. Please keep this campsite where it is!</p> <p>The second one is moving and clustering the campsites at Stockton Presque Isle. Here I agree that something needs to be done to minimize erosion impact for the campsites in that area. The proposal is to move the sites toward the point (again hike in sites) and cluster them similar to a mainland campground (similar to Big Bay State Park). My feeling is it would be better to limit the number of campsites to 6 or so to limit impacts, and still be able to maintain kayaker friendly sites.</p> <p>Lastly, I believe that Sand and Basswood Islands have a lot of visitors already, and that providing cheap motor boat transport, would negatively impact the experience of other visitors.</p>	10/13/2009		<p>Nesvold, Scott . 27760 Cty Hwy C Washburn, WI 54891 USA scott.nesvold@gmail.com</p>
22	<p>Two points:</p> <p>1.Motorized transport of tourists out to Basswood and Sand would add too many people to those islands and reduce the wilderness atmosphere.Let alone the increased motorized traffic.</p> <p>2. The present Oak A camp site is the best campsite in the park for kayakers as it is.</p> <p>Thank you for the opportunity to comment.</p> <p>Scott</p>	10/13/2009		<p>Wilson, Scott . Stewart Road Hayward, WI 54843 USA wilson@cresthillresort.com</p>
24	<p>As a long time wilderness guide and user of wilderness, in particular the Apostle Islands, I have seen greater and greater restrictions on limited impact users.(as in "little" relative to motorized users) Effectively limiting freedoms</p>	10/14/2009		<p>weiss, greg .  cornucopia, WI 54827 USA</p>

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	<p>(rights) to us as citizens. I believe that in general, this is wrong.</p> <p>1. Group campsite move: Specific to the current proposal, and managers should understand, sacrifice is necessary to save and serve the greater whole. Group campsites do just this. They are highly impacted. If we move to new sites that are more difficult to access, impact may be more of an issue than the current sites which have been in use since at least 1990.(from when I first came here) Oak Island group site is in a nice site. We need a group site on Oak. Why not leave it? IF the only reason is because group sites are not usual in wilderness, and the decision is based solely on "rules", then it is essentially a wrong decision.</p> <p>2. Motorized boats: should not be allowed as a concession business in wilderness, as this takes away the wilderness character, and instead installs an entity that most people travelling in wilderness are trying to escape from, if only for a few days. Motors are the largest threat to the serenity of our parks. Again, this may sacrifice the good graces of a few that want to make a buck, or are disabled.</p> <p>In closing, when we debate "wilderness" needs we are really talking about what is best for nature, but we need to take human nature into account as well in order to make the decision that will work in the real world.</p> <p>Thank you.</p>			<p>nativeways@hotmail.com</p>
25	<p>two concerns that I have noted in looking through the proposed management plan. both regard campsite relocation.</p> <p>1) Oak Island group site A. preferred alternative includes relocating this site. I support leaving site as is, and, if needed, putting additional measures in place to protect sandspit vegetation, if that's the driving issue. I've used this site several times with family camping groups that exceed single site capacity and it seems to be an excellent site for groups. there are few group sites in the islands, and all but oak A are near docks and more busy areas. to me its desirable to offer group options in less developed areas, not just near docks. I strongly support leaving existing Oak group site in current location. if you want to add another group site near dock, that would be fine, but don't reduce wilderness camping options for groups. in fact, increase them!</p> <p>1a) following up on that - this suggests to me reconsideration of current policy on group camping. I've been told by Park staff that if two families totaling more than 7 individuals wish to camp in proximity and hang together in one site, they need to use a group site rather</p>	10/14/2009		<p>Settgas, Roy . 75405 Church Corner Rd Washburn, WI 54891 USA rsettgas@centurytel.net</p>

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	<p>than 2 adjacent single sites. this really reduces options for groups. I'd support relaxing this policy to allow use of adjacent single sites and/or creating additional group sites in wilderness areas.</p> <p>2) Presque Isle sites. proposed relocation in preferred alternative. I support leaving as many of these sites intact as possible. these are some of the nicest campsites in the islands. I can't imagine where they would be relocated to that would result in nearly as pleasant a camping experience. my understanding is that one factor prompting relocation is the distance for privy pumping. if that's the case, I suggest relocating the privies, not the sites. erosion is also an issue I'm sure. I would think that serious erosion control measures could be done for less \$\$ than the cost of relocating campsites.</p> <p>I see that one alternative is to retain some of the northern sites. I definitely favor that, but prefer retaining all or most of the sites and doing whats needed to address erosion. I know its not an easy one, but these are really great sites.</p>			
26	<p>just submitted a comment on campsite relocation and was looking through the preferred alternative again. saw the discussion of construction of a visitor center down on Bayfield waterfront if property available from a willing seller. made me think of one of the great losses to the parkscape in recent years, which was the demolition of the old Bayfield lookout tower, which offered a fabulous vista of the islands which is currently not available anywhere that I can think of.</p> <p>I'd suggest making it a priority to purchase property from a willing seller to create a mainland high spot viewing facility. fire tower hill would be the obvious place, should that property be or become available. but there are other hilltops around that could give a similar panorama.</p> <p>to my tastes, this would be money better spent than a new visitor facility in Bayfield that would divert people away from the old courthouse that offers a sense of Bayfield history as well as park info.</p>	10/14/2009		<p>Settgas, Roy . 75405 Church Corner Rd Washburn, WI 54891 USA rsettgas@centurytel.net</p>
27	<p>To whom it may concern,</p> <p>As a resident of Bayfield and a previous employee of several of the kayaking outfitters operating in the area as well, and a frequent user of the Apostle Islands National Park I feel it only appropriate that I voice my opinion with regards to some of the changes that are being proposed under the so-called "Preferred Plan" by the park.</p> <p>1. The first change suspect to criticism is the proposed moving of the Oak A campsite (the group site on the southwestern sandspit) from its present spot, to a hike in site near the dock. At present the location of the campsite is just perfect , not only in its beauty and ease of access</p>	10/14/2009		<p>Kept Private Kept Private bayfield, WI 54814 USA Kept Private</p>

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	<p>after a long days paddle but with regards to the balance between remoteness and comfort of amenities like a pit toilet, fire ring, etc. It is one of the nicest campsites in the whole park. Apparently it seems that whomsoever proposed this idea has never kayaked enough in the area before, ( with a group , mind you), to know what it feels like to paddle a long day and sometimes through a small squall and reach safety and after a long exhausting day be able to set up camp without going for an unnecessary hike. At present most of the campsites both individual and group are located in very ideal and locations considering the factors one might encounter on Lake Superior.</p> <p>2. The second change is moving and clustering the campsites at Stockton Presque Isle. I understand that somethings need to be done here to minimize erosion impact. From my understanding the proposal, under the so-called " Preferred Plan" is to move the sites toward the point (again hike in sites) and cluster them similar to a mainland campground. Would it not be better to cut back on the number of campsites here to somewhere around 4-8 campsites. Thereby cutting down on the use, maintaining the pristiness, and maintain kayaker friendly sites At present I believe thee are 16 sites/ Cutting this number in half will surely minimize impact.</p> <p>3. Lastly, under the so-called "Preferred Plan" it is being proposed to have motorboats shuttling people to Basswood and Sand Islands as a concession business. To accommodate this they are looking to add picnic areas and bathroom facilities. Don't these islands being so close to the mainland and mainland points of access already receive the highest impact from visitors in the park, and would not this proposed plan just increase the amount of impact. Would this not just detract from the wilderness experience even more.</p> <p>If your plan is to protect the park wouldn't it be better to just minimize the amount of individual clustered campsites, maintain the present group campsites and decrease the maximum capacity of people at these group sites. Wouldn't it be better to minimize commercial motor boating in the area and maintain its wilderness appeal.</p>			
29	<p>The below comments I offer are in response to the NPS Preferred Plan. It is my belief the this plan is misguided and unfairly detracts many of the units most important assets. Particularly, the kayaking community has been overlooked as a significant economic force and constituency.</p> <p>While we are well aware of the impact of the economy on travel and recreation, it is important to note that all kayaking participation is UP, in fact at historic highs when compared to other paddlesports. This is according to a number of pieces of research from the Outdoor Industry Association.</p>	10/14/2009	St. Cloud State University Outdoor Endeavors	Bartha, Ivan L. 102 Halenbeck Hall 720 4th Ave South Saint Cloud, MN 56301 USA ilbartha@stcloudstate.edu

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	<p>Here are my comments regarding the plan:</p> <p>1. The OAK A site is magnificent. With proper management, it should stay where it is. While I understand that it lies within the wilderness area, I would challenge the NPS to consider the value of those campers being exposed to that wilderness. Ultimately, those close to the land are the stewards, advocates and protectors. Consider what is lost over what is gained out of convenience.</p> <p>2. On Stockton Island, I would concur that there needs to be some reorganization of camping at Presque Isle. Instead of moving the campsites, it would be more prudent and economical to reduce the number of campsites in half and develop a rotation plan with the old campsites to allow for reclamation and to minimize erosion. Again, consider that kayakers are one of the largest user groups at Stockton. Creating hike in sites will effectively alienate this group. Another key improvement necessary is the improved management of the Stockton Island group sites. They are in rough shape.</p> <p>3. Developing expanded concessionaire driven service transporting passengers to Basswood and Sand Islands further marginalizes the resources, cheapens the visitors experience and serves to benefit a small number of people. The visitors partaking in this type of service deserve better. If we are going as far as developing a concession business on these islands, where does it stop? Maybe we look at developing snack bars and gift shops next?</p> <p>As a career outdoor recreation professional, I have an understanding of the importance of managing natural resources at all levels. The Apostle Islands National Lakeshore is such an incredibly unique resource that I am surprised and a little disappointed that the NPS has decided to go this direction. I would challenge the contemporary wisdom that has guided past decisions and outcomes, both good and bad. We cannot afford to detract from the wilderness experience or misguide visitors on the value of this unique natural resource.</p>			
30	<p>As a person who has kayaked in the Apostle Islands for two decades and as a person who has enjoyed power boating for five decades I would strongly encourage you to NOT expand or increase the accessibility of Sand Island in any manner to power boat traffic. Sand Island is unique to sea kayakers in that it offers so much of a wilderness type experience that falls within the capabilities of many paddlers without unduly putting them in harms way relative to increased perils of having to cross large expanses of open water and the associated risks of doing so. This island offers so much to the kayaker in terms of caves, trails and the lighthouse all within the context of a not overrun environment. If the intent is to make the islands</p>	10/15/2009		<p>kinderman, robert . w4834 5th av trego, WI 54888 USA</p>

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	<p>more accessible(which I believe is a questionable need) I would recommend you look at the more outlying islands that are very attainable by power boat but fall outside the capabilities of many kayakers. I realize other island such as Oak,Stockton and Rasperry also exist but they do not offer, in my opinion the same opportunity to " get away from the crowd " experience that is possible at Sand and I believe that part of this is due to Sand's location at the far west end of the islands and removed from the much heavier power boat traffic nearer to Bayfield. Please let this natural location continue to protect this area and not neutralize it with National Park sanctioning of increased power traffic. You have a difficult job in manageing mutiple use of the resources but in this case you have many options in other islands outside of those close to shore that are better reserved for the folks who can at best only cover about three miles an hour in their kayaks as opposed to twenty to forty mph in power boats.Multiple use does not mean that all the critters have to always share the same cage particularly when mutiple options are available.Please rethink your considerations with this issue and thank you for the opportunity to provide my thoughts.</p>			
31	<p>Lighthouses- I support this plan</p> <p>Life Estates and Former Use &amp; Occupancy Properties- This too, I support. I especially like the idea of redeveloping the trails from place to place. Even if the buildings were not open for entry, being able to hike to, read interpretive signs and view them would be a great asset to the park.</p> <p>Nonwilderness Lands on the Islands I have question about this. Specifically offering shuttle service to park patrons. The park service needs to define their intention by doing this. Is this to make money so that the local park service can better support itself? If so I think it is worth considering. Though the proposal language alone makes me question this. Proposing to provide "inexpensive public transportation" Suggest subsidy. Power boat Shuttles and tours are priced by individuals to make profit or more likely to pay for slip fees, maintenance, and time reimbursement. I think it is the minority that is making a great profit on this service. It is more a means to support a lifestyle. My guess is that providing this service would not be a money making operation and would likely cost the park more, consequently raising fees for others. If this is the case I think shuttles should be left to private parties.</p> <p>Wilderness I support the development of wilderness areas but come on!!!! Oak A is the best group site in the Park!!!! Please do not close it!!!!!!</p> <p>The Presque Isle sites are complicated. I too would like to</p>	10/15/2009		<p>Ketchum, Leo E. 612 West 4th St. Washburn, WI 54891 USA leok1221@yahoo.com</p>

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	<p>see erosion control. As the sites are currently set up it is not really possible. Closing them would be a shame. Having everyone have to walk into the campground would be a shame.</p> <p>How about a low profile fence along the dune edge with 3 or 5 main walkways developed up from the beach to the trail behind the campsites. If that is not enough maybe we also reduce the number on the sand dunes in addition to opening a Presque Isle campground?</p> <p>NPS Visitor Centers</p> <p>I think the Visitor center is great but I see the draw to having it in town.</p> <p>I guess park service finances would have to drive this.</p> <p>Leo</p>			
32	<p>Some proposed changes to the Apostle Islands absolutely cannot happen. The NPS Preferred Management Plan for the Apostle Islands sets the tone for NPS projects/ management for the next 15-20 years. It is my belief that the sea kayaking community will be hit hard if certain aspects of this plan are approved. The plan clearly states that you are considering adding "inexpensive" public transportation to some of the inner islands. This is being done to accommodate small AND large groups of tourists. You are going to add MORE campsites and toilets to Sand, Basswood and Oak to accommodate MORE people. More is not better when it comes to wilderness areas.</p> <p>If you allow for "inexpensive" public transportation to the inner islands, that means kayakers will to navigate among even more commercial boat traffic bringing lots tourists to the islands for picnics in which they'll undoubtedly leave behind trash, create noise and impact these pristine islands. Before you know it, we'll have concessions stands selling beer and T-shirts on Sand Island.</p> <p>On Stockton Island, you are considering taking away some of the Presque Isle campsites and making them "Hike-In" sites. That only further alienates sea kayakers. Sea Kayakers are a major economic force and constituency and the sport itself is UP and even at historic high levels when compared to other paddlesports.</p> <p>This Preferred Plan effects me and my program big time! I can honestly say that some changes have been for the greater good (erosion control projects and lighthouse restorations), and those changes cost money. That's why permit fees have increased so quickly in 4 years. However, these proposed changes are a direct result of "selling-out" to to save budgets. It's the Islands that will feel the brunt of these proposed changes, and unfortunately, the islands do not have a voice.</p> <p>Please reconsider this plan!</p>	10/15/2009	University of Wisconsin-Stout	<p>Keenan, Jeffrey . 41 Sports &amp; Fitness Center 220 13th Ave East Menomonie, WI 54751 USA keenanj@uwstout.edu</p>

ID	Correspondence	Receipt Date	Org.	Name, Address Email
33	<p>Hi,</p> <p>I would like to see the Apostle Islands kept as natural as possible so increasing the traffic to the islands will not accomplish this.</p> <p>Please do not allow more motorized boat traffic to travel to the islands, find other ways to raise money, fast and easy is not always the best.</p>	10/15/2009		<p>Kept Private</p> <p>Kept Private</p> <p>Bloomer, WI 54724</p> <p>USA</p> <p>Kept Private</p>
34	<p>I've read the proposals and find the information located within very interesting. I'm glad to see some planning for the future being done. I like some of each proposal but can't decide on a single as my favorite. I've been a user / visitor of the Apostle Islands for close to 30 years and think the area is incredible and you all have done a good job caretaking it for us.. I've been an avid boater all my life and the park is probably the number one reason I live in this area. I've kayaked, sailed and/or power boated to all of the islands over the years and camped on many of them. Currently my interest is in sailing the Apostles. I've used the docks for overnight trips as well as anchored. Over the last two years I've sailed around 1000 miles within the lakeshore boundaries. My first inclination is to try to scale back the use of the lakeshore as I've seen degradation of both the physical land and water over the years as well as the "wilderness" experience. It's hard to go anywhere in the park without intense, sometimes rude human activity. Increased use has given us everything from garbage on the beaches to noise pollution to basic overcrowding. I've had other boaters - kayakers in particular disregard the reservation system and camp in the same area without reservations totally ruining the wilderness experience. These are mostly commercially operated groups from out of the area. This summer I was anchored out on Outer Island and two gentleman from the Twin Cities had reserved the campsite only to have a group from Camp Manitowish come in in the afternoon and ask if they could stay there too. What were they going to say? No?. I felt sorry for them as now they were camping with 8 teen age girls when they thought they had the site to themselves. Also, I understand the park boundaries only include the water that is within a quarter mile of shore but something needs to be done concerning the "go fast boats" unregulated or unenforced exhaust volume. I've heard them out on the lake for hours during the late afternoon / evening hours and it's pretty distracting. If their noise output is within the decibel limits stated for the lakeshore I'd be very surprised. Some of the ideas in the plan would increase the use of the seashore and I disagree with them. Adding shuttle services to the islands is one of them. If this has to be done maybe just do Basswood and leave Oak and Sand as they are. Oak is setup very nice as it is with the group site distant from the dock. This separates two distinct users and putting campsites that are accessed at the dock would create a bunch of traffic in one area that right now is pretty quiet. I would imagine that the Kayakers</p>	10/15/2009		<p>McGinley, Mark K.</p> <p>226 West Pine Street</p> <p>Washburn, WI 54891</p> <p>USA</p> <p>mariposafarm@yahoo.com</p>

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	<p>would rather have their boats close to a campsite as well since most of the equipment on a kayak is in separate containers - pretty hard to haul far. Sand Island has a lot of use right now - adding even more with a commercial shuttle would exacerbate the crowding now experienced. I was out there a few weeks ago (Late September) paddling in the caves and saw quite a bit of traffic. Photo opportunities were missed due to the boat traffic - that and the two-cycle smell from outboards permeating the caves made the trip somewhat unpleasant. Having boats shuttling people by the caves would make this even more crowded. There was mention of possibly adding more docks and in poor weather these are nice to have to tie up too (in a lee). It seems there are not many choices for when the wind is roaring out of the south for safe docking. Maybe if any are added consider this? More docks might spread out the current population using the islands for recreation too - as well as mooring buoys. I'd feel better at night if I knew the boat next to me wasn't going to slip anchor and hit me if the wind shifted. With the sailboat charter services we do get a lot of inexperienced boaters. I understand that the lakeshore is set up to be enjoyed but having it as a wilderness area necessitates that it includes the wilderness experience too. Thanks for your time reading my ramblings!</p>			
36	<p>There are some very disconcerting components to the "Preferred Management Plan" being proposed for the Apostle Islands National Lakeshore. As someone who loves sea kayaking for the opportunities for solitude and quiet of nature, I'm concerned about increasing public transportation to the islands.</p> <p>Under the proposed preferred management plan, the Islands themselves will suffer the most, and unfortunately, they do not have a voice. Relocating favorite campsites, increasing public transportation to the islands, setting up picnic areas, more toilets and installing new buildings and shelters could have DEVASTATING effects for those who truly love and care about this place.</p> <p>While I agree that there are some things that should be changed - I believe a compromise somewhere between Alternative 1 and Alternative 3 is a better choice. The improvements to the Light Stations are acceptable - maintenance and repairs of existing boat docks are acceptable.</p> <p>I am concerned about the proposed development of new group campsites on Sand, Basswood and Oak islands. The plan does not describe the size of the campgrounds nor the number of campgrounds to be established.</p> <p>I am also concerned about some of the development related to park operations. Is a BRAND new park operational facility actually necessary? Cannot existing structures be refurbished. I realize that ranger stations are</p>	10/15/2009		<p>Kept Private Kept Private Bowling Green, KY 42104 USA Kept Private</p>

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	<p>essential - but does Meyers Beach need a new one? When discussion the Bayfield visitor center expansion - does the plan simply mean utilizing more space inside the existing building, or actually expanding the size of the building?</p> <p>As someone who struggles with obtaining permits for my outdoor programs when we travel to other parts of the country, I've always appreciated the ease of permit acquisition at the Apostle Islands National Lakeshore. Historically, these lands have been managed very well, despite the continual increase in annual visitation. I am very concerned that this may all change, especially "land management" if the Preferred Plan is put into action.</p>			
37	<p>I will admit I am new to the Apostle Islands true greatness. Originally I am from Illinois and have made my way up to school in Menomonie. When I was little my parents always spoke of a majestic and pristine place known as the apostle islands. Growing up and earning my eagle scout only made me want to get out to the islands more!</p> <p>This summer I had the privelage of staying on Sand, Basswood, and Oak Islands. It was my first time kayaking and I was afraid to say the least. But there is something about being on that water that made me want to go back and kayak it more and more. It was the peacefulness and the beauty that these islands have.</p> <p>In scouts I have seen this happen before. What I believe is that tourism will destroy the aura that such a great place gives off. I am asking you please reconsider this choice and keep apostles the way it is.</p>	10/15/2009	SAORE, Alresco, GreenSense, Stout Adventures	Erickson, Charles G. 1903 5th Street West Menomonie, WI 54751 USA ericksonc@uwstout.edu
38	<p>This plan will begin the destructive process to a wonderful place. It is imperative that such pieces of legislation are not passed so that we can retain the innate beauty of the islands so that people such as myself, who truly appreciate, take joy in, find refuge in, and deeply connect with, such natural wilderness places, may continue to enjoy them in their wilderness state.</p>	10/15/2009	AORE	Kept Private Kept Private Holland, OH 43528 USA Kept Private
39	<p>I am saddened to see the proposed changes to the Apostle Islands. As someone born and raised in a big city but now part of a small community, I am horrified to think that the proposed changes will make the Apostle Islands more accessible and open to tourists. Never in my life have I seen beauty that compares to all that is Lake Superior... and what a well kept secret! The very simplicity and peacefulness of a place like the Apostle's is what makes it an absolute gem. Let the big cities build and bring in the "big bucks"; save the wilderness and tranquility of the Apostle Islands for people who appreciate it.</p>	10/16/2009		Kept Private Kept Private Menomonie, WI 54751 USA Kept Private

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4	<p>I am deeply concerned about the Management Plan suggesting that historical artifacts which currently are held at Little Sand Bay will be moved to Michigan. Bayfield history should stay in Bayfield. I sincerely hope that discussions will occur with Wisconsin State and Bayfield local historical organizations before any material is moved from Little Sand Bay.</p> <p>Thank you for considering my suggestion</p>	10/16/2009	Bayfield Heritage Association	Kept Private Kept Private Bayfield, WI 54814 USA Kept Private
41	<p>I believe the beauty of the Apostle Islands is the fact that they remain pristine and natural. If the introduction of having boats transport people to them and the introduction of more "commercialization" happens, then it will deter the people who make it a kayak/camping destination. I know many people do this as their main trip of the summer/fall. It changes the whole flavor of the Islands. I believe in the principal of "Leave No Trace". It is erased if this change goes through.</p>	10/17/2009		Kept Private Kept Private Hayward, WI 54843 USA Kept Private
42	<p>Why do you want to take the easy way out and sell your soul to the devil? Lifelong beauty is MUCH, MUCH more important than short-term pacification of budget needs? Show some respect for the environment and what we were given. Why do we need to accommodate LARGE tourists groups? These are pristine islands...and home to thousands of species. Before you know it, we'll have concessions stands selling beer and T-shirts on Sand Island...that is beyond DISGUSTING!! Please find another way to meet the budget...DO NOT sell your soul to the devil!</p>	10/18/2009		Kept Private Kept Private Bloomer, WI 54724 USA Kept Private
43	<p>I have read portions of the General Management Plan for the Apostle Islands National Lakeshore and am quite concerned about the section proposing the transfer of archives and artifacts relating to the Bayfield area to an inaccessible site far from their historic locale.</p> <p>I have also spoken with a number of Bayfield citizens, some in their 90's, whose families donated cherished family photographs and other artifacts, which were an important part of the area's history, to the National Park Service before the Bayfield Heritage Association's Heritage Center Museum and Research facility was constructed. They felt assured that with the establishment the Apostle Islands National Headquarters in Bayfield, Wisconsin their donations would always be available locally for review and research by local citizens and organizations. These individuals now feel betrayed by the NPS because it is most likely that if the items are removed from the area to the upper peninsula of Michigan local residents will never have access to them and the NPS will not utilize them for educational and research purposes as local entities and individuals would. They feel a portion of local history will be lost forever.</p>	10/18/2009	Bayfield Heritage Association. Inc.	Robnik, Spencer . 37431 Apostle Bay Road Bayfield, WI 54814 USA srobnik@centurytel.net

ID	Correspondence	Receipt Date	Org.	Name, Address Email
	<p>My concerns echo theirs and as a member of the Bayfield Heritage Association who is working to expand and enhance the local research capabilities the loss of archives and artifacts to a distant storage site seems illogical and contrary to all accepted historic preservation principles.</p> <p>My appeal is to effect revision the General Management Plan which will allow established local historical entities to acquire and accession archives and artifacts donated to the NPS by Bayfield area individuals and organizations so that they will remain and be preserved locally for educational and research purposes. It would seem that if the NPS has no use for the items other than to put them in storage in a remote holding facility that transfer of the items to local established historical entities where they would be preserved and utilized would be a logical alternative.</p> <p>Everyone I have spoken to in Bayfield has agreed that local historical archives and artifacts should remain in their locale of origin. It is our history, we have the organizations, facilities and people to preserve it, please let it remain in our area.</p>			
44	<p>Thank you for opportunity to comment on the draft "General Management Plan / Wilderness Management Plan / Environmental Impact Statement" for the Apostle Islands National Lakeshore", dated August 18, 2009.</p> <p>Since 1975 I have worked and recreationed throughout the Apostle Islands National Lakeshore (AINL), and have visited or camped on 19 of the 21 islands in the park. I regard AINL as a unique and stunning gem of America's National Park System, and overall I have been very supportive and positive with the general approach taken by the National Park Service (NPS) for managing this fabulous resource.</p> <p>However, I wish to express my strong opposition with the NPS proposal to relocate 15 to 16 existing campsites on Stockton Island from the Presque Isle Bay tombolo to new locations on the adjacent Presque Isle peninsula. The EIS proposal states the purpose of the relocation is "to address resource concerns (e.g., bank erosion and potential for bear-visitor conflicts)." I directly challenge the basis for these "resources concerns." I recommend that the campsites are not relocated, but that NPS/AINL enhance current education efforts on user-practices that will eliminate human-caused erosion factors and continue decreasing the risk of adverse bear-human interactions. Should the NPS/AINL decide to relocate these campsites, it is my opinion that there will be a substantial decrease in the number of visits to and camping at Stockton Island. I know that Stockton Island camping visits will drastically decrease from my family, friends, and me.</p> <p>1. Even if tombolo campsites are relocated to Presque Isle</p>	10/18/2009		<p>Nehls-Lowe, Henry L. 1888 Briarwood Lane Oregon, WI 53575 Madison, WI 53575 USA henry.nehlslowe@gmail.com</p>

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	<p>peninsula, bank and shoreline erosion along the Stockton Island tombolo will likely continue at the current rate.</p> <p>It is clear that camper disturbances at the tombolo sites play a factor in vegetation loss and barren soils, but after many visits over the years it is equally obvious that these human factors in bank erosion are dwarfed when compared with the overwhelming natural erosional wind and water forces generated by Lake Superior. NPS/AINL staff have already installed mitigation measures (sand ladders and wooden fencing) at the Stockton Island campsites and these are already decreasing human-caused erosion, but it is clear that personnel and resources are limited to add new and maintain existing structures and that unknowing visitors can easily bypass these physical obstructions.</p> <p>Despite the small impact that human factors play in the erosion of the tombolo, these factor can be further decreased or eliminated by educating visitors and campers about the sensitivity of the tombolo and that these stewardship practices can protect this area, even when camping. A good example effective education is that the current food storage and waste disposal practices used at the Stockton Island campsites have tremendously decreased bear-human conflicts and encounters, and such an approach could also similarly decrease human-attributed erosion factors. Those who camp on Stockton Island already must take extra efforts to travel there, they typically have a high degree of wilderness appreciation, they visit Stockton Island because they understand the uniqueness and sensitivity of the island's natural features, and tend to be very motivated with following extra measures and practices required to protect this invaluable resource. Therefore, rather than relocating the campsites, I recommend that NPS/AINL focus efforts on educating visitors and campers to better understand the ecology and sensitivity of the tombolo, increase their knowledge of conditions and places where people should not walk or trample or disturb, and empower people to take a stronger ownership for protecting these areas. Through these educational actions alone I believe that the camper-caused erosion factors on the tombolo would halt or decrease to a negligible level. Campers could also be enlisted to undertake small projects during their stay that further enhances mitigation and protective measures. This stewardship will also carried away to protect sensitive areas throughout Stockton Island and AINL.</p> <p>2. Relocating tombolo campsites to the Presque Isle peninsula will probably not decrease the potential risk or actual number of bear-human conflicts and encounters on Stockton Island.</p> <p>Even though Stockton Island has the highest black bear density in North America, AINL/NPS staff inform me that bear-human encounters on Stockton Island are uncommon</p>			

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	<p>and bear-human conflicts are rare and less frequent than other islands, such as Hermit, Oak, &amp; Manitou, which have had recent conflicts. Many visitors to Stockton Island hope to see a bear in its natural setting, but this requires frequent and persistent visits to areas well beyond the campsites and to other areas of Stockton Island such that campers often depart Stockton Island disappointed with not seeing a bear. Based on my observations and discussions with other visitors and AINL/NPS staff, bears do not visit or seek food in campsites because of the vigilant adherence to NPS-outreach on food storage and handling, and waste disposal practices. Without the attraction to food at campsites, bears tend to stay away from humans and spend their time seeking food from natural sources. I acknowledge that the tombolo area appears to have higher amount of natural food sources for bears than the proposed campsites on Presque Island peninsula, but food sources are present across the island. If NPS/AINL wants to decrease the risk of potential bear-human conflicts, then efforts must continue being placed on educating visitors. Relocating the campsite will not change this to a notable degree.</p> <p>3. The tombolo campsites on Stockton Island are the most popular in AINL, however should NPS relocate these to the Presque Island peninsula it is likely there will be a substantial decrease in the number of camping visits at Stockton Island.</p> <p>The draft plan acknowledges that among all islands "Stockton Island receives the highest amount of camping use (&gt;4,500 campers/year)". The reason for the high use of the Presque Isle Bay campsites is clearly observed in plan: "This campground is popular for many repeat visitors, and the location of the campsites along the shoreline is considered highly desirable due to the great lake views and privacy between sites." In addition to fabulous views and privacy, each campsite has also easy access to water and beaches, and regular breezes across the tombolo keeps down the population of bothersome or biting insects. I regard Stockton Island's tombolo campsites as the most beautiful and desirable of any contiguous campsites managed in the United States by NPS.</p> <p>The plan also acknowledges that the relocating these campsites "may limit the number of sites with lake views and may reduce the screening and privacy between sites." Discussions with NPS/AINL staff indicated these proposed campsites will likely be placed away from the lakeshore and in a wooded loop or circle. My experiences with other contiguous campsites at AINL are not positive and I avoid these. The worst contiguous campsites at AINL are those on the central portion of Basswood Island. These are a far uphill walk from the beach/dock area, are heavily wooded and have much less air movement than the shoreline and are very buggy, have bumpy and uncomfortable tent pads, and despite being within 100 yards from the shoreline none have a lake view. The draft plan also acknowledges</p>			

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	<p>this overall issue, "This proposal will likely detract from the visitor experience, especially for those repeat visitors that enjoy staying at a particular site in the existing [tombolo] campground. Although this is an important resource protection strategy, the relocation of the [tombolo] campsite will likely have a long-term, moderate, adverse impact to the visitor experience." I concur with these observations and, should the tombolo campsites be relocated and there is such an expected "long-term, adverse impact", I also anticipate that my family, friends and I will have our experience "detracted" to such a degree that we will no longer camp on Stockton Island.</p> <p>Thank you for the opportunity to comment on the draft plan.</p> <p>Henry Nehls-Lowe</p>			
45	<p>October 18, 2009</p> <p>Dear Mr. Jarvis:</p> <p>I am writing to comment on the draft general management plan for the Apostle Islands National Lakeshore. I am a resident of Washburn, WI. I spent every summer of my childhood on Sand Island, where my family has had property since the 1890's, including the historically significant Campbell cottage now under a life estate with family members. I serve on the Washburn City Council and I chair its Historic Preservation Committee. I am, however, submitting this letter because of my personal interest.</p> <p>The Lakeshore is vitally important to this region. It is not only a treasured ecological, recreational and historic resource, it is also a source of employment and economic return for the local area. I support the National Park Service in its effort to protect the Lakeshore.</p> <p>I am pleased to see that the draft plan places an emphasis on historic preservation. Congress established the Lakeshore to protect its history, as well as its wilderness and recreational values. Many of the historic properties in the Lakeshore are in decline, despite the concerted efforts of the Lakeshore staff to protect them. I urge the final plan to make a commitment to protecting all of the remaining historic properties.</p> <p>I am also please to see that the plan makes general reference to the need for relying on partnerships. As I know from personal experience, this area is the source of extraordinary community support in many areas. The Park Service should take advantage of this culture to help maintain the historic properties. In particular, I recommend that the Service take advantage of the assistance of the Apostle Islands Historic Preservation Conservancy for this purpose. As I know first hand from my life on Sand Island and my experience with other historic properties,</p>	10/18/2009		<p>Jensch, Kristine M. 502 E. 4th Street Washburn, WI 54891 USA kjensch@centurytel.net</p>

ID	Correspondence	Receipt Date	Org.	Name, Address Email
	<p>maintaining those buildings is a difficult and expensive task. The Park Service cannot do this alone.</p> <p>Finally, I request that the final plan define a continuing role for the historic use families who have maintained their properties for generations. These families are part of the history of the Lakeshore that is to be preserved. The Park Service has an unique opportunity to preserve not only the buildings themselves but also thread personal, social, and community continuity and history that is one of the distinguishing features of the Apostle Islands. I can think of no better example than that of the Dahl family which, despite having lost its property years ago, still remains active and committed to the history of the Islands. The Service should reach and embrace the assistance of these families.</p> <p>Thank you for considering these comments.</p> <p>Kristine M. Jensch 502 E. 4th Street Washburn, WI 54891</p>			
46	<p>To quote Aldo Leopold, "Conservation is a state of harmony between men and land." How can we leave no trace when we begin to abandon the principles that both will preserve and ensure the integrity of our country's wild green spaces? If the national park service truly believes in the notions of accessibility then the idea of relocating group site# A on Oak Island near the dock would douse that objective. The proposal has the group site #A moving to the dock near group site # B, which is located near two individual camping sites. The landing conditions at the dock is rocky to say the least and would not be ideally suited for newer paddlers and other travelers to land at this location on Oak Island.</p> <p>If governmental representatives are going to whim and hah that the current location of Oak Island group site #A could be better utilized as a beneficial imperative historical marker. I would like to articulate the point that the area around dock near Oak group site #B would need to be drastically enlarged to accommodate the amount of people, who would be visiting that part of the island. For example each group site can accommodate up to 20 paddlers on each site and the individual sites are set up to provide spacing for up to 7 people at their respective camp sites. That would be a total of 54 boats, people plus gear in a small area around the dock on Oak Island excluding possible daily visitors via power boats, sailboats and future tourist ferries as well. In order to provide spacing for such large numbers, the area near the dock would have to be largely increased to accommodate the possible number of potential visitors to the area. Doing this would inevitably encroach on established animal habitats. To initiate convincing points from the Leave No Trace Organization,</p> <p>1. Leave what you find</p>	10/18/2009	SKOAC	Ehlers, Courtney M. 184 71st way ne Minneapolis, MN 55432 USA

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	<p>2. Respect the wildlife 3. Be considerate of other visitors</p> <p>It is clearly evident that these objectives are being thrown to the trail side in order to accommodate an idea that would not enable boaters of all various abilities to enjoy a wilderness area that is loved by so many people. When I was attended the hearing of the public reviewing of the new wilderness management proposals for the Apostle Islands, which was held at a local REI (Recreational Equipment Inc. ) store in Minneapolis this past July. I asked the National Park representative if they choose to pursue the idea of moving Oak Island group site #A, would they replace it with an individual site. The gentleman could not provide me with a sensible and eligible reason why an individual site could not go there. He went on to whim and hah about the objectives of preservation and the idea of building a replica of an historical cabin that was in the same location as Oak Island group site # A years ago. I understand the principles of Leave No Trace, conservation and preservation. I am not an idiot. I have a graduate degree in environmental studies in policy and education from Bemidji State University and have been an passionate outdoor enthusiast for years. Additionally, I work in the business field of sustainability and promote programs that help companies to become green. If fiscal budgets are tight and there is a possible notion that some state or national parks may be closed due to a lack of funding resources. Then doesn't make more sense to preserve what we have and improve upon it to a certain degree. And then transfer the excess allotted money to help protect other wilderness areas that are managed by both state and federal agencies.</p> <p>The national parks and the protected wilderness areas are one of the greatest treasures of this country. To bring back a reproduction of a historical building is not protecting the wilderness. The actual replica cabin would be that of a Native American man, who had lived on Oak Island many years ago. I think a greater adulation would be to honor their wonderful culture and customs through preserving the area and allowing people of various backgrounds to enjoy the love of the wilderness. I think this renowned Native American quote summarizes it well, "Treat the earth well: it was not given to you by your parents, it was loaned to you by your children. We do not inherit the Earth from our Ancestors; we borrow it from our Children."</p>			
47	<p>I am greatly disturbed by AINL's plan to remove artifacts from the Bayfield area. These items were donated to ensure their preservation and availability for the Bayfield region populace. Financial concerns may be valid, but if the NPS is unable to appropriately protect and preserve our heritage, please consider a partnership with the Bayfield Heritage Association to keep these artifacts available to the public.</p>	10/18/2009	Bayfield Heritage Assoc.	<p>Heaton, Nancy . 27 S 8th St Bayfield, WI 54814-4792 USA nehm22@charter.net</p>

ID	Correspondence	Receipt Date	Org.	Name, Address Email
49	<p>I first visited the Apostles in the year that the park was founded, 1970. I was a sophomore in high school and we took the ferry to Madeline Island, slept in the back of my dad's Econoline van, and were the classic state park car campers. I've also motor trolled in power boats over the years for trout and salmon, done some smelting, and also studied in the park as a UWEC student on a glacial geology field trip in 1975. In the last 10 years I've done my most intensive and regular visiting in a sea kayak. My fellow paddlers ( I belong to a local kayak club) and I average about six trips annually, more in a 'good' year. I also frequently write about the park in a blog called The Lake is the Boss. I've had a wide range of perspectives on the area over years, and hope my comments are useful. Since camping is a prime consideration for us kayakers I'll mainly focus on that. The main reason we go to the park is Lake Superior. Being on or near the lake is important for a number of reasons. Kayakers tend to carry more and heavier gear because we can. Hauling that gear up to a campsite that's a fair way off the water is more difficult and can be problematic in other ways as well. The Rocky Island sites between the dock and the spit come to mind. Being in the woods not only makes sitting on the beach a bit more difficult but not having the breeze off the lake offers perfect flying conditions for winged vermin like mosquitoes and black flies, the main deterrent (other than wind and waves) to island camping in the month of June. The landings are also rocky, which makes sense on an island named 'Rocky', but it can be tough on gel coat and fiberglass and Kevlar boats. The best sites and the ones that get reserved immediately are the sand spit sites on the south ends of many islands, including Rocky, Oak, Cat, Outer, Ironwood, and Otter. Moving sites away from the spits, like was recently done on Cat Island, is an unpopular move with virtually 100% of the kayakers I've spoken with. The plan to move the group site on Oak away from the spit and up to the crowded dock area is universally opposed by kayakers. Although the power boaters and sailors are invariably friendly, they also have not paddled all day and tend to party a bit longer and louder than the average kayak group which is typically in the tent before 10pm. The reasons of erosion, difficulty of pumping vault toilets, and even the Wilderness Act are not persuasive. A change in wind direction can cause the lake to erode eight feet of sand beach overnight. I've seen careless power boaters have their boat filled with sand on York Island after a wind and wave shift, and awoken to find the edge of the beach directly underneath my kayak cockpit rather than four feet behind my stern, where it was when I went to bed. Beach grass and beach peas are coming back (many planted by the NPS and volunteers) and the vegetation combined with the sand ladders used on a number of sites appears to have the erosion in check as best as it can be. I can't speak to the toilet pumping but since it's done with a boat, I'd have to imagine that closer to the water would be better. Wilderness Act considerations were also cited a reason that the group camp on Oak needed to be moved to the</p>			<p>Kept Private Kept Private St Anthony, MN 55421 USA Kept Private</p>

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	<p>dock but wouldn't that site be grandfathered in as an existing camp? And why wasn't it excluded from the designated wilderness like the dock area on Oak unless the plan was to move it eventually anyway? That area is probably the least wilderness-like are of the park with rusting implements, home sites, and even an old stove a ways back in the woods. At the very least, the group site could be turned into two individual sites which would then triple the access to the area for the public over what it would be if the site were moved. The phrase, "and the wilderness campsite would be restored", pg 124, leads me to believe the removal of the group camp would mean removal of the outhouse, picnic table, and fire rings. This spot would then become exactly like the northeast beach on Bear Island. Everyone camps there but there are no amenities and no effort at maintenance of any sort by the NPS.</p> <p>The camp at Presque Isle on Stockton is another issue. I don't know of a lot of kayakers who camp there due to the proximity to the dock and tour boat landing there, but the people that do use it enjoy it because of the amenities mentioned above. Close to the main attraction, Lake Superior, and your own little slice of beach for one night is the reason this is the favorite campsite in the park for a number of people, especially those that don't own boats or kayaks and reach the camp via the shuttle boat. The new campsite that's proposed is inland in an area of cedar trees, if remember right, It will be a significant step down for the folks who use this lone 'public access' option to the only one of the outer ring of islands accessible by that means.</p> <p>I also feel that a few more campsites in logical spots would be a good idea and would increase capacity without any increase in the 'perception of crowding' talked about in the studies that have been done. The above mentioned northeast beach on Bear Island is a prime example. Even though its 'wilderness' that's exactly where the vast majority of folks with a Bear Island wilderness permit camp, since its also the site of an old camp. Add sites in the logical spots where people camp anyway. A bear box, fire ring, vault or composting toilet, and a picnic table in a few select spots would not seem to be that big of an issue, especially with talk of millions for a new visitor center in Bayfield. Bear Island would be another prime spit for a campsite once the lease expires for the existing tenants.</p> <p>I must admit I do like the idea of an on the water visitor center somewhere in Bayfield. The old courthouse is classic and needs to be maintained but it is most certainly off the beaten track, especially for the casual tourist/visitor. Best of luck with that but I would strongly suggest that the routine maintenance and general upkeep be well covered before any big dollars are allocated for a major project. Having to have the Friends group buy toilet paper ain't gonna fly with a major capital expenditure on the waterfront underway.</p>			

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	<p>Regarding other aspects of the preferred alternative, I like the idea of more access to the inner island by folks with no boats, Maintaining the light stations is key since they are a major attraction as well as the best collection of light stations on North America in many peoples estimation.</p> <p>Development at Meyers Beach rather than Little Sand Bay is puzzling. There are docks and launch facilitates, the fish camp, and it's a major jumping off point for the western islands and, in fact, the entire park. Meyers Beach on the other hand, is merely a place to park and hike the trails to the sea cave overlook and launch for day trips to the sea caves. It has a dead end road, an outhouse, and a picnic shelter, if I recall, and that's about it. At Little Sand Bay there is existing infrastructure and a fairly central point for hitting Sand, York, Raspberry, and indeed all the islands on a multi day trip. Any kayakers that checked in and picked up permits at Meyers Beach would need to get back in their cars and drive up to LSB to start a multi day trip. It would seem simpler, more convenient, and much more efficient to work with the Little Sand Bay site. A small building at Meyers with a ranger or volunteer to point out the dangers inherent in visiting the sea caves would seem to be all that's needed there.</p> <p>The Apostle Islands National Lakeshore is a wonderful spot, one that makes me proud as a native Wisconsinite. I don't always agree with all the decisions made but I love the park and will continue to visit as long as I'm able. I hope this feedback has been useful.</p>			
50	<p>concerning the Plan for the south shore of lake superior and the 'Apostle Islands': i really think that your plan will ruin the best of what their is to offer. we need places that are only accessible to those who are willing to go silently iwthout leaving a trace. this is one of those places. Others will have to enjoy them from afar, or get in shape. We need to encourage that physical invlovement in today's society of obesity.</p> <p>if budgets are an issue, then increase the camping/visiting fees to kayackers or whomever. Madeline Island can suffice as the easy access for those who require it. it is large enough to support the numbers. Recent improvements to the lighthouse and the erosion prevention are great, the present users can pay for them. some things need to be kept as Wilderness!! I think the new plan would violate the original intent. We need to maintain the natural beauty of this pristine jewel.</p>	10/20/2009		<p>dahlke, dale . E1880 790th ave knapp, WI 54749 USA dahlked@uwstout.edu</p>
52	<p>I'm writing because I'm concerned about the Apostle Islands National Park "Preferred Management Plan". My opposition to the plan is because I'm of the school of thought that parks and designated Wilderness Areas need to be kept wild. Although the plan keeps 80% at is current state 1/5 is being "improved". I'm worried that if our National Parks can't keep places wild than who can? We have enough areas in the country that have lots of</p>	10/20/2009	<p>NC State Campus Recreation Outdoor Adventures</p>	<p>Schneider, Scott R. 835 Ivy Meadow Ln Apt 1C Durham, NC 27707 USA scottyschneid4@hotmail.com</p>

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	<p>accomodations. We don't have many wilderness areas that are truly wild. This is even more applicable to Wisconsin and Michigan. I'm sure you thought about this arguement already, but I encourage you to reassess it. The parks that our country holds above all others are the ones that made tough decisions in there time. This is an opportunity for the Apostle Islands to be one of the parks that our children love and cherrish because it is one of the only WILD places left in the midwest.</p> <p>Sincerely, Scott Schneider 262.719.2959</p>			
53	<p>I have concerns with two aspects.</p> <p>1. The current Visitor Center is a focal point building for the community. Years ago the residents raised money for this to be restored so it could house the V.C. This was all done in good faith, to keep it a place for the visitors. I do not wish to see it become only an administrative building. During the summer, almost daily I have visitors come into the Library asking where the Park V.C. is. I simply need to tell them to go up Washington and see the Old County Courthouse. So many appreciate the architecture of the past in this town.</p> <p>2. The historic Bayfield papers that are stored in the Park's archives were donated there so that they would be protected for Bayfield. It is ludicrous to think they would go to MI. These papers were given there in good faith since that is what seemed to be best for the community. Please release these to the Bayield Historial Association for best keeping.</p> <p>As a former Park employee and resident of Bayfield, I am very aware of the love/hate relationship that can exist between these two entities. I feel the Park needs to act as a PART of this community and make decisions that serve the common good right here.</p>	10/20/2009		<p>Kept Private Kept Private Bayfield, WI 54814 USA Kept Private</p>
55	<p>I am against moving the group campsite on Oak. If it can't be a group site, please change it to an individual site. To keep it, change the wilderness zone to not include this area. It is above the sand spit, not on the sand spit as your literature refers to it.</p> <p>Also, I am against adding a boat shuttle. This can be accomplished through private companies and not the park service. There are already shuttles going to the islands and it would be an ongoing expense to maintain boats.</p> <p>Also, I am against having a kiosk in Bayfield. The current location is fine. It is convenient and cheaper than building something new.</p> <p>I am against moving the sites on Stockton. Put up some</p>	10/20/2009		<p>Kept Private Kept Private Davenport, IA 52804 USA Kept Private</p>

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	<p>signs to warn against erosion and invest in a longer hose for the outhouses.</p> <p>Have a fee box for boats for day use of docks at all the sites on all the islands.</p> <p>Enforce the fees more.</p> <p>Thanks!</p>			
56	<p>These comments are regarding the intention under the preferred alternative to relocate the Presque Isle campground on Stockton Island to a more inland location-likely on Anderson Point.</p> <p>I have been an annual visitor to the park since 1975, missing only one year during that entire time. My visits last from 7 to 16 days, usually arriving on board my personal sailboat. My family and/ or friends have camped in the Presque Isle campground on a number of occasions. My extended family has enjoyed the trail system and the beautiful bays on Stockton each year. I can say without reservation that the Presque Isle campground is so unique and special that any final decision on the part of the Park Service to relocate it must be subjected to in-depth scientific study over a number of years.</p> <p>Comments regarding relocation of the campground at Presque Isle</p> <p>Banks along the shoreline: My proposal is to modify the Management Plan to permit Park managers to decide to move the campground only if a multi-year study indicates that there is no other option. Such a study should be conducted over an extended period of time such as 10 years or more.</p> <p>My own casual observation of the sand banks along the shore of Presque Isle Bay in 2009 is that these banks have benefitted greatly from the ongoing management practices that were recently instituted in an effort to reduce erosion. The banks this past August (2009) were mostly covered with vegetation. In past years, I have observed little or no vegetation on these banks. It appears that campers are using the new cable and log stairs and are respecting the rustic fencing that limits access to the banks. I believe that these and possibly other best management practices, if employed on a universal basis, will control human impacts to the banks. If bank erosion caused by humans can be controlled, then the campsites should not be moved.</p> <p>If the campsites are in fact removed from the shore, there will still be a need for the employment of best management practices along this shoreline because hikers, boaters and campers will continue to swim and use the beach. Consequently, I question whether moving the campground will even have the benefits expected under the draft</p>	10/20/2009		<p>Sharrow, James D. 2105 Woodhaven Lane Duluth, MN 55803 USA jdsharrow@msn.com</p>

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	<p>Management Plan.</p> <p>Bears: I know how difficult situations can develop when bears lose their timidity. My boat happened to be tied up at the Stockton Park Service Dock the night "MacArthur" climbed aboard several boats. I was enjoying a ranger program another year when "Skar" entered the fire area and had to be chased off into the woods. We don't know where these bears learned to not fear humans. The Park has instituted a strong bear educational program. It appears that aggressive educational outreach regarding bears has paid off with good results for this campground. I question whether relocation of the campground for the purpose of reducing the risk of exposure to bears will have any benefits.</p> <p>Cultural resources: If the erosion can be controlled, then concerns regarding the native cultural resources buried in the sand should prove to be unnecessary.</p> <p>Idea for improved pumping of outhouses at Presque Isle:</p> <p>During the public meeting at Barkers Island in Superior last September, the difficulty with pumping the campground outhouses was mentioned. I believe that a hose could be permanently buried along the trail that could run to the park service dock, enabling a barge to tie up at the dock and receive the sewage materials rather than anchoring in the bay. The pipe could be installed with directional boring equipment that would have only minimal disturbance of the soils, and could be fitted with a system called a "pig" for clean out at the end of each pumping operation. The pumps would be portable and would be wheeled in along the trail when used. Such a system could simplify the process of pumping the outhouses each year and would be more controllable under varying weather conditions. Thank you for this opportunity to comment on the draft Management Plan.</p> <p>James D. Sharrow 2105 Woodhaven Lane Duluth, MN 55803</p>			
57	<p>I prefer Alternative One. No changes. I am a sea kayaker and make frequent trips to the islands from April through October.</p> <p>Please do not move or change the group campsite on Oak sand spit. Please change it to an individual site if you can't allow a group site there.</p> <p>Please keep all sites on Oak and Stockton the same.</p> <p>Please do not add a boat shuttle. This is just more</p>	10/21/2009	Superior Kayak and Outdoor Adventure Club (SKOAC)	<p>Quinn, Jane . PO Box 24538 Edina MN 55424 Minneapolis, MN 55424 USA janeq@skoac.org</p>

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	<p>expense and there are already private shuttles that go out there. There probably isn't a need if they aren't running boats out there already.</p> <p>Please keep the current Park Service location and don't add any additional places to maintain.</p> <p>The only addition I feel is necessary is a fee box for day use at docks.</p>			
58	<p>I appose the movement of the Museum collection to Keweenaw as proposed on page 35.</p>	10/21/2009		<p>Gover, Bill . 85685 Eight Point Lane Bayfield, WI 54814 USA pgover@centurytel.net</p>
59	<p>As an ACA instructor and active member of the Twin Cities paddling community I am very disappointed to see that the preferred management plan would eliminate the Oak A group site. While I see a lot of good with other aspects of the plan, I believe that Kayakers as a group have been forgotten. While kayaking in the park has seen significant growth, the proposed plan reduces the accessibility of the sport to new people, contradicting the "concept" of the Plan.</p> <p>The Oak A group site is one of the best group sites within the Apostle Islands National Lakeshore, It is also one of the most accessible for people new to the sport of Kayaking. I know this site has helped to spark the interest and desire to return to the islands in many new paddlers. Moving the site to a location near the Oak B site would significantly detract from the experience. The launching and landing area is much smaller. Carrying heavy loaded kayaks over the rocky beach by the dock is difficult and has a higher potential for ankle and other injuries. The proposed additional use of the group site would also reduce it's availability to kayakers.</p> <p>The current campsite at the dock does not have a view of the lake, which is one of the main desires of most park patrons when choosing a camp site. This is likely to be the same with the new site. Many kayakers dislike campsites near the docks. I think that this is because Kayakers expend a reasonable amount of energy to get to their destination. Finishing a days paddle at a camp site by a dock is like hiking for a day and spending the night surrounded by RVs., Pets and Generators.</p> <p>Our local kayaking club promotes the safe usage of the park by Kayakers. We take people to the Apostle Islands on a regular basis. One of the best ways to promote kayaking safely is to travel in a group with a number of experienced people. While these groups are often small, they exceed requirements of the individual sites. The limits for an individual site for kayakers are normally the number</p>	10/21/2009	ACA,SKOAC	<p>Kept Private Kept Private Fridley, MN 55432 USA Kept Private</p>

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	<p>of tents rather than the number of people. Kayakers tend to have small tents, but usually one per person or couple. We need to maintain a good ratio of experience to inexperienced people with at least two experienced people in a group. If you keep to less than three tents you may only have one or two new people who can experience the park at a site using the individual sites.</p> <p>Personally I do not think that the size of a group dictates if an area is in the wilderness, but rather it is determined the accessibility. However if group size is the limiting factor, would it be possible to allow this to be an individual site with unlimited tents?</p> <p>The only other concern I have heard was the group site at sand spit has historical value. To me the best way to promote the historical value of the site would be to have a plaque with the story so that visitors to the campsite can read and imagine being there in the past. The clearing is relatively small, it has been that way for at least a hundred years and this in itself is partly the historic value of the area.</p> <p>The site is an established campsite and in an area that is unlikely to be effected by its continued use. It would be a shame to take it away from a growing community of users. It would be even more disapointing to spend a large amount of money to replace this site with something worse.</p>			
60	<p>Dear Superintendent Krumenaker, Mr. Nepstad and other NPS general management board members,</p> <p>First, I would like to thank you for your time this fall traveling around the area listening to peoples comments about the drafted general management plan for the Apostle Islands. My partner and I attended the public meeting at the Bloomington REI store in September. I found the NPS staff to be informed about the plan, willing to talk to us one-on-one, and willing to listen to our concerns. I realize that much time and effort has gone into making this plan, not only trying to please patrons of the park but also thinking about the environment effects that people have on the park area while recreating.</p> <p>My partner and I have been vacationing on Stockton Island for our anniversary for the last 6 years. This last summer we celebrated our relationship with a ceremony. Determined not change the dates of our annual Stockton Island trip we planned our wedding around it.</p> <p>Stockton Island is our deserted island fantasy. Being on the island is a calming, peaceful, and regenerating vacation. I really cannot think of a more rejuvenating, peaceful and healthy way to spend my time. I love getting out of my tent virtually on the beach and willing myself to enjoy the brisk water. I love wearing pretty much just my</p>	10/21/2009		<p>Waldoch, Carol Y. 3221 Columbus Ave Minneapolis, MN 55407 USA coldwater22@hotmail.com</p>

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	<p>swimming suit the whole week. I love adding fresh blue berries to our pancakes. I love lying in a hammock while watching the wind change over the water. For these reasons we do not want the NPS to move the camping area to Presque Isle. This would drastically change our Apostle Island experience.</p> <p>I understand that moving the camp ground on Stockton Island from where it presently is to Presque Isle is because a number of things, namely the erosion problem and issue of pumping out the toilets that are strung out along a mile stretch.</p> <p>As far as the erosion problem, I liked how the park service chose to shut down and change some of the sites that have been most affected by erosion. By changing and shutting down some sites this action did not take much away from patrons. With this action and educating patrons on the erosion problem I think this will be effective.</p> <p>As far as the toilet pumping issue, I understand that stringing a hose out for many feet in the water increases the risk of pollution and that this is an expensive process. We all know that Lake Superior is not pristine, but the work toward environmental stewardship is best a collective effort. On any given summer weekend a camper on the island can count dozens of mostly motor boats that are moored just off shore. The carbon foot print that just one of these boats has on Lake Superior (not to mention the entire world) is not even comparable to a person who took the public ferry to get to Stockton, uses only non motorizes equipment to explore the area and only brings what they can carry.</p> <p>As far as the expensive created by pumping out these toilets; boaters may argue that when they are moored they do not use the island toilets. But this is just wrong. I have personally seen time after time moored boat patrons jump in their dingy and come to the island for a number of activities, one being person hygiene issues. In fact last year I watched a motor boat patron jump off her boat and swim toward shore so that she could have ground to stand on while washing her hair in the lake. If the issue is expense why doesn't the NPS charge boats for mooring in the bays of Stockton Island?</p> <p>It costs my partner and I about \$130 for the 2 of us and a canoe on the ferry. It costs \$70 for the camping permit (which we are more than willing to pay). It costs around \$100 for all of our food for the week. I would say that my camping equipment could be valued at around \$1,000. Taking into account depreciation of equipment, it costs to two of us about \$320 to spend a week on Stockton Island. Another reason we like Stockton Island is because it is an affordable weeks' vacation. By doing just a quick internet search I learned that the motor boats and/or sail boats equipped with the type of motor that is needed for Lake Superior cost hundreds of thousands if not a million</p>			

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	<p>dollars. I would argue that if one can afford a boat that costs \$485,000 one can afford to pay a \$10 a night mooring fee in order to pay for the toilets to be pumped twice a year. If expence is an issue, we would be more than willing to pay an extra fee for this pumping service, but I would like this extra fee to be shared by all users.</p> <p>I know that this argument seems to be off topic as to what the general management plan is stating. But, I sense that the lack money is at the heart of most controversies. It may be true that having a traditional circle camp site is easier to maintain, is more cost efficient, and in theory disrupts less area. However, Presque Isle has more mosquitoes and no blueberries. I would argue that Stockton Island not having this run-of-the-mill set up is what makes Stockton Island a unique gem that all of us look forward to exploring.</p> <p>We are just common people with a very modest income. We borrow the canoe that we take to Stockton Island each year. We feel that we are the common people that the National Park Service founders had in mind when creating our national parks. We have camped in many other places in North America, but Stockton Island is the only place that we come back to year after year. Please keep the camp sites as they are especially our beloved site 19.</p> <p>Sincerely, Carol Waldoch and Monica Travis 3221 Columbus Ave Minneapolis, MN 55025 612-201-7122 coldwater22@hotmail.com and monicatravis03@yahoo.com</p>			
62	<p>October 21, 2009</p> <p>Apostle Islands National Lakeshore 415 Washington Avenue Bayfield, WI 54814</p> <p>Re: Comment on Draft General Management Plan</p> <p>Dear National Park Service,</p> <p>Lake Superior holds a special place in heart. My husband and I married on the shore of Lake Superior at Lutsen, Minnesota in 2004 and we honey-mooned on Stockton Island in the Apostle Islands. We have returned to Stockton Island every summer since our wedding. For the past three summers we have camped for two full weeks with my teenage step-son. We have thoroughly enjoyed our camping experiences on Stockton Island. We love waking up to the sound of the waves hitting the beach. We love watching the duck families paddle by our campsite every afternoon. We love playing frisbee in the surf and watching the sunset from our campsite. Stockton Island is truly an island paradise in Lake Superior.</p> <p>Alternatives 2, 3, and 4 of the Apostle Islands National</p>	10/21/2009		<p>Stohl Powell, Jennifer A. 1234 Seminary Avenue St. Paul, MN 55104 St. Paul, MN 55104 USA jstohl@visi.com</p>

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	<p>Lakeshore Draft General Management Plan ("the Plan"), all contemplate moving the Stockton Island campground from the beach to an interior site near the ranger station. The reasons articulated for such a move--to prevent erosion, avoid bear encounters, preserve archeological sites, and simplify waste management--do not hold water for me.</p> <p>As you are aware, not all of the campsites face the same erosion problem. Some sites are close to the water while others are up on a small cliff. Two of the campsites on the cliff have already been removed to create beach access points. At the same time, fences were installed this past year to prevent campers from using their cliff access to the beach. However, very little education of campers took place this past summer. I was not informed regarding the beach access points while obtaining my permit or when I got off the cruise boat at the dock.</p> <p>NPS has done an excellent job educating campers about the use of bear lockers for food storage. NPS should now provide similar education about erosion prevention and give these methods a chance to work before taking the drastic step of relocating the entire campground to a much less desirable location. In addition, NPS should further examine continuing the sand ladders in place at many of the campsites.</p> <p>There have been few bear incidents and sightings in recent years. Further, a bear census has not been conducted in over five years so NPS cannot know the current bear population on Stockton Island. The park ranger on Stockton Island this summer estimated that there are currently less than 20 bears on the Island. Less bears, less bear incidents, and less sightings do not justify moving the campground from its current location.</p> <p>NPS states that items of archeological significance are located in the Stockton Island campground. However, NPS has failed to provide any information to support this claim so that the public can have an opportunity to evaluate it. If there are indeed such artifacts, I would prefer to see NPS close two to three additional campsites where the items are located rather than relocating the entire campground to a less desirable location. As discussed above, NPS already closed two of the 19 campsites in 2009.</p> <p>Finally, NPS states that waste removal from the latrines is difficult. However, it is possible to continue removing it as it has been done from the boat with a very long hose. I, however, would be fine with the removal of the latrine near campsite 18 even though it means a longer walk to the nearest latrine. I would be willing to walk further--and assume other campers would as well--to preserve our incredible campground overlooking Lake Superior.</p> <p>Moving the campground to the interior would drastically reduce the enjoyment of camping on Stockton Island. The</p>			

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	<p>campground, overlooking the lake, is truly a gem. The interior of Stockton Island, however, near the ranger station is not a desirable location. It will be filled with bugs (i.e. flies) since you do not get the same breeze coming off the lake to clear the bugs. It will also be noisy with campsites closer together and also closer to the boats running their generators at the docks.</p> <p>The proposed campsite move also unduly impacts the campers. The Plan does not contemplate any changes that would impact the sailors that drop anchor in the Presque Isle Bay (I've seen as many as 40 sailboats in the Bay on a summer weekend) or the boaters who moor at the dock. The sailors and boaters use the Island amenities (latrines, trash disposal, water, beach access) and they will continue to do so without change under this Plan.</p> <p>But the Plan contemplates moving the campground to a much less desirable location which will eliminate my two weeks of paradise on Stockton Island each summer. I urge you to find alternative means to preserve its beauty. Please do not move the Stockton Island campground.</p> <p>Sincerely,</p> <p>Jennifer Stohl Powell 1234 Seminary Avenue St. Paul, MN 55104</p> <p>cc: Secretary of the Interior Ken Salazar Congressman Dave Obey Senator Amy Klobuchar Senator Al Franken</p>			
64	<p>My comments are relative to the preferred alternative you have identified.</p> <p>For the most part I agree with the recommendations you have made. In particular I agree with your decision to rehabilitate at least 2 more light stations as I believe their historical significance is too great to lose.</p> <p>I do not agree with your plan to develop additional "public transportation" to the non-wilderness inner islands. The noise, fumes, and waves associated with power boats already overwhelming this area do not need to be increased. Without an increase in transportation to these islands the need for new visitor facilities would be lessened. I feel that development of facilities on the mainland for park visitors would be a better use of resources and would be more likely to get used.</p> <p>My opinion is that money that would be spent to build a new visitor center in a central Bayfield location could better be used to continue (or increase the pace of) rehabilitation of the light stations on the islands. By forgoing construction of a new visitor center it might be possible to restore all</p>	10/22/2009		<p>Mettel, Carson .</p> <p>Middleton, WI 53562 USA</p>

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	<p>three light stations being considered. While it would offer some benefits to users I believe a new visitor center can be delayed, while reconstruction of the light stations cannot. Renovation or expansion of the current park headquarters would be a better alternative.</p> <p>Thank you for considering my comments and for your work to preserve this wonderful place that I cherish.</p>			
65	<p>I have been sailing at the apostles for 15 years or so and have been to all of the islands. I have also done many camping trips on Oak Island and Stockton where I took the shuttle out.</p> <p>I feel that you should go with Alternative 1. No changes. The changes with the preferred alternative cost a lot of money for new buildings, additional employees, etc.</p> <p>If you do spend money, please use it to maintain what you currently have. Perhaps add a biffey on Manitou. Please keep Oak A as a group campsite and please keep all the campsites on on Oak and Stockton the same.</p> <p>It also seems that the kayak outfitters get too many of the available camp spots. They should be limited to a small percentage of total availability. I have also been out there when outfitters say they have our site but their permit displays a different site. This was Living Adventure Outfitter group on two occasions over the years.</p>	10/22/2009		<p>Howard, Amanda .</p> <p>Rockford, IL 61101 USA amandahug29@gmail.com</p>
66	<p><b>Background</b> I have been a visitor and user of the Apostle Islands National Lakeshore for nearly 20 years. My visits through the middle 1990's were primarily as a sailor and over the past 10 years primarily as a sea kayaker. I visit the area multiple times during the summer season, paddling and camping on the islands. I have also visited occasionally during the "off" seasons. I have been to every island within the park multiple times. I have camped at nearly every campsite and in many wilderness zones.</p> <p><b>Overall Comments and Observations (some outside scope of the Plan) –</b></p> <p><b>Fiscal Responsibility</b> The Plan document is exhaustive and thorough and presents many ideas. I am generally supportive of activities to safeguard and protect the physical assets in the park, especially the lighthouses. I am not supportive of changes to add staff and their ongoing associated expenses. The fact is the Park has had funding issues in the recent past (and a new fee structure was implemented to partially address part of this issue) and will in all likelihood face similar issues in the future.</p> <p><b>Fee System</b> Recently the reservation fee system was reviewed and</p>	10/22/2009		<p>Kept Private Kept Private Minneapolis, MN 55410 USA Kept Private</p>

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	<p>revised. The end result was an increase in the daily site fees and the institution of dock fees to be charged to vessels utilizing park docks. I am supportive of the changes and willing to pay the increased campsite fees and contribute to the Park's revenues. The dock fees are on an honor system to be paid by sailing and power vessels via pay-boxes at the various dock locations. Problem is, some of the docks (Devil's, etc.) don't even have pay-boxes!!! Why? This is inexcusable. The Park should immediately install pay-boxes at all docks that currently do not have them. Without them, the fee system is without merit. Power and sailing vessels already stop at and use the facilities at campsite locations without incurring or contributing fees. They use the picnic tables, toilets, etc. and move on.</p> <p><b>Prioritization of Resources</b> The Plan identifies numerous infrastructure and facility changes to be completed but is inadequate re basic improvements to island campsites. Improvements to these campsites would be significantly less expensive and should receive priority attention. See specific comments below.</p> <p><b>Management of Campsite Usage and Outfitters</b> While the Plan is largely silent regarding this issue I feel compelled to comment. The Apostle Islands are a fantastic kayaking destination. While it is great that more and more people, especially kayakers, are enjoying the park I am concerned about the management of this usage. It appears that more and more outfitters are now guiding more and more paying customers to tour the islands. I have seen outfitters from Minnesota, Wisconsin, Michigan, Illinois and beyond, and more and more of them every year it seems. This usage competes with private parties and the park must manage these respective visitors. It would be a shame if outfitter usage continues to expand to the detriment of private usage ala the Grand Canyon. Please don't allow this to happen.</p> <p><b>Trash Cleanup</b> Again, the plan is silent regarding this topic. There are numerous areas of old trash dumps throughout the islands these dumps contain rusted metal from cans and other sources, bottles, assorted trash, etc. Specifically, on Sand behind Group site A, on Oak in the vicinity of Site 6 in the North Bay, etc. These trash dumps should be cleaned up and the trash removed. It's an ugly eyesore and hazardous as well.</p> <p><b>Feedback re Specific Sections of the Alternatives</b></p> <p><b>Light Stations</b> I am supportive of work to stabilize, rehab and restore the lighthouses in general. The work on the Raspberry lighthouse was excellent. It would be outstanding if over time additional lighthouses could be protected and rehabbed as well. I would prioritize them by need and</p>			

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	<p>location inner islands first (Sand). I do not believe staff should be added to additional locations. They can be interpreted via waysides and written materials.</p> <p>Former Use &amp; Occupancy/Current Life Estates If the West Bay Club becomes available this could be an excellent location for an additional campsite. Rehabbing for public use should only be considered if it is self-sustaining from a financial standpoint.</p> <p>Shaw Point again, could be interpreted via waysides/brochures and without the addition of staff. Rehabbing for public use should only be considered if it is self-sustaining from a financial standpoint.</p> <p>Nonwilderness (Islands) Why can't "new" transportation opportunities be developed via the shuttle services provided by the cruise line(s)? I am against the idea of the Park acquiring boats etc. to begin their own shuttle service. This would be a waste of money in my opinion and would result in dormant assets for the majority of a calendar year and ongoing maintenance expenses. Any new transportation options can be arranged through the private sector.</p> <p>Is it really necessary to relocate the Stockton Island campground? What other less expensive options might be considered re bear management etc.?</p> <p>Wilderness Area</p> <p>This topic has been significantly shorted in the plans. As noted in the plan document the significant area of growth in recent years has been within the kayaking community. We are active users of the campsites throughout the islands. Many of these sites should have priority to receive vault toilets, picnic tables, bear boxes, etc. BEFORE other capital improvements to facilities, docks etc. noted in the plan.</p> <p>I strongly disagree with the plan to relocate the group campsite above the sand spit on Oak. Once again, (as in the case of the site on Cat see comments below) this would result in the loss of the best group site in the islands. Relocating it to the dock area would be horrible it is too busy there already with the dock and vessels it attracts, one group site already, the individual site in the same vicinity and the ranger station. Please do not make this move. If you persist, at least the group site above the spit could be converted to an individual site.</p> <p>Many of the campsite locations need attention. For Example: Manitou this site desperately needs a vault toilet. The toilet down at the fish camp is too far to be of use for campsite visitors. This is a nice site that gets a lot of use and every visitor is digging a cat hole out in the woods. This is unacceptable especially given the huge sums of money</p>			

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	<p>targeted for all sorts of other purposes.</p> <p>Ironwood again, this site needs a vault toilet. All visitors are currently digging cat holes.</p> <p>York none of these sites have picnic tables. Why not? They are needed.</p> <p>Cat this site has been relocated to the former cabin location. The new compost biffy is nice. The relocation of the site however is extremely disappointing. One of the premier sites in the islands has been significantly diminished. It is now stuck back in a dark hole in the woods with little or no lake view. In addition, the intended tent pad is on a slope! Why? It appears to me the intent is to stick the campers back into the woods presumably so they and their tents can't be seen from the water? How is this any different from a paddler making their way out to an island and a private campsite and sitting on the beach to enjoy an evening sunset only to have a sailboat or powerboat anchored right offshore? These crafts diminish my enjoyment in the same manner as a tent might to someone else.</p> <p>Mainland Unit No significant comments.</p> <p>Mainland Visitor Centers/Contact Stations From a user perspective, I feel that the existing facilities are fine and meet required needs. If a new Bayfield Visitor Center is built than all operations should be consolidated.</p> <p>Operational Facilities I disagree with the establishment of a ranger station or visitor station at Myers Beach. This is an unnecessary use of funds that would also demand future operating costs. It is sufficient to have informational waysides or written materials.</p>			
67	<p>I have been a regular park user for over 20 years. What a spectacular place! Thank you for your efforts to keep it wild and unspoiled.</p> <p>I fully support the general direction of the preferred option and have the following comments:</p> <p>1. Providing inexpensive transportation to the inner islands (Oak, Sand, &amp; Basswood) for day hikes, walk-in camping, etc. so more people can have an island experience is a commendable goal. However, there should be a limit to the number of day users on any specific day. I am not sure what that number should be, but it seems obvious that too many day visitors on a busy holiday weekend would diminish the experience for all users. Just like campsites limited the number of over-night users, possibly the shuttle</p>	10/22/2009		<p>GRISWOLD, GREG .</p> <p>RHINELANDER, WI 54501 USA greg_lu@frontiernet.net</p>

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	<p>boat size could limit the number of day users.</p> <p>2.I support maintaining existing designated campsites, and creating new sites on the inner islands. Ideally designated campsites (new and existing, wilderness and non-wilderness) should be partially open to sunshine and breezes, have natural separation for privacy, and have scenic views of the lake. For examples: Site 4 on Oak is too closed in with a minimal lake view, Sites 1, 2, &amp; B on Sand have minimal separation, but Sites 6 &amp; A on Oak and Sites 3 &amp; A on Sand are great sites. When camped in a site with the amenities noted above my enjoyment at least triples! Possibly all the designated campsites could be non-wilderness areas to allow for more management.</p> <p>3.As noted in 2 above, Site A on Oak is a great site. I am sorry it is proposed to be relocated.</p> <p>I appreciate the opportunity to comment on the Draft Plan and all the work you do to manage the Park.</p>			
68	<p>Thank you for opportunity to comment on the draft "General Management Plan / Wilderness Management Plan / Environmental Impact Statement" for the Apostle Islands National Lakeshore", dated August 18, 2009.</p> <p>For the past 10 years I have intermittently had the opportunity to visit various parts of the Apostle Islands National Lakeshore (AINL). I have personally visited or camped on 10 of the islands in the park. I have traveled there with friends and with family members on different occasions, and no one who visits the park leaves unaffected or unimpressed. I regard AINL as a unique and marvelous part of America's National Park System, and overall I have been very supportive of and positive about the general approach taken by the National Park Service (NPS) for managing this resource.</p> <p>However, I wish to express my strong opposition to the NPS proposal to relocate most of the existing campsites on Stockton Island from the Presque Isle Bay tombolo to new locations on the adjacent Presque Isle peninsula. I have visited Stockton Island and camped and hiked there more than any other part of the AINL. I think that the proposed changes will severely diminish the experience for campers and dramatically reduce the number of visitors as well.</p> <p>My understanding of the purpose for the proposed campsite relocation is "to address resource concerns (e.g., bank erosion and potential for bear-visitor conflicts)." I think that those aims could be met by far less drastic and less expensive changes that would actually have much greater impact on the future use and educational value of that specific area and the tombolo ecosystem in particular.</p> <p>Rather than relocating the campsites, NPS/AINL should</p>	10/22/2009		<p>Balin, Adam .</p> <p>Fitchburg, WI 53711 USA</p>

ID	Correspondence	Receipt Date	Org.	Name, Address Email
	<p>enhance current education efforts on user-practices and stewardship of that area with particular emphasis on the unique characteristics and fragile nature of the tombolo area. This would go a very long way to eliminate human-caused erosion factors, which I suspect are only a very minor portion of the forces causing change in that specific area. The natural effects of winds, waves, and subsequent erosion have far greater impacts. At my last visit this summer with family and friends, we were for the first time made aware of the importance of staying off the fragile slopes from the beach to the campsites on the tombolo, which previously had been managed with sand ladders that implied that was the best and appropriate way to access the campsites from the beach. The construction of low fences along the shore perimeter of the campsites, and the marked reduction of sand ladders, effectively eliminated the former practice. However, I suspect the same could have been achieved with simple signage and removal of the sand ladders and educational efforts from the rangers and volunteers at the site.</p> <p>The current sites are undoubtedly among the most impressive and stunning of any I've encountered in any National Park. I am very sure that moving the sites to the Presque Isle peninsula will hugely detract from the camping experience for those fortunate enough to be able to visit Stockton Island. I strongly suspect, based on hiking in the peninsula area many times over many years, that the lack of breeze and more forested area will make that a much more insect friendly and camper unfriendly location. Furthermore, the inability to have shore access will make visiting by kayak much less desirable and perhaps impossible to combine with an overnight camping stay.</p> <p>I also believe campsite relocation from tombolo to peninsula will have little or no effect on camper/black bear confrontations at Stockton Island, since those encounters are already quite uncommon. The main cause of those events is improper storage of food and of other potential bear attractants. The current consistent education about and camper compliance with regulations on secure storage of items in the provided bear lockers has minimized bear/human interactions. In fact, this last summer the ranger told us there had not been a bear siting (even by campers out early trying to find them) all year yet (as of mid-August). In general, finding a bear requires hiking far from the current or proposed campsites.</p> <p>The campsites on Stockton Island's tombolo area are a major draw to the AINL for thousands of people yearly, including me, my family, and numerous friends. We all appreciate the beauty and respect the unique nature and fragility of this wonderful place. I respect what has been done in managing this area to date and the current efforts to update the management plan. Nevertheless I am hoping that you will not make the proposed/favored change to relocate the campsites, as doing so will probably result in cessation of what has been an important activity for my</p>			

ID	Correspondence	Receipt Date	Org.	Name, Address Email
	<p>own family and likely thousands of others'.</p> <p>Thank you for the opportunity to comment on the draft plan.</p>			
69	<p>I am writing this to ask you to PLEASE reconsider and DO NOT move the Apostle Islands Lakeshore campsites on Stockton Island inland!</p> <p>My husband and I ferried out to Stockton Island the summer before last to join our daughter and her partner on the campsite they love and return to year after year. It was absolutely beautiful! It was primitive camping at it's finest! The broad expanse of Lake Superior shining before us, the exceptional white sand beach to stretch out and relax on, the views of the other Apostle Islands peeking out here and there to beckon us to come visit--all that would change drastically were you to move the campsites inland. PLEASE DO NOT MOVE THOSE CAMPSITES INLAND!!!</p> <p>Thank you.</p>	10/23/2009		<p>Kept Private Kept Private Duluth, MN 55808 USA Kept Private</p>
70	<p>Thank you for allowing me to comment on the APIS General Management Plan.</p> <p>I would like to address the proposal to relocate the Presque Isle campsites on Stockton Island. I understand the declared issues to be, 1: To address erosion concerns, and 2: To minimize bear conflicts.</p> <p>I have camped at the Presque Isle sites with my my family 4 times over the past 6 or 7 years for about 16 nights total. There is something about these sites that is hard to describe; maybe it's the sunset views, the proximity to the beach with its often swimmable water, the relative privacy, and the relative lack of mosquitoes (trust me, there are other spots on Stockton where they are far more prevalent!). Whatever it is, these current campsites have an essence that has brought my family and me back to the Apostles again and again. Erosion will happen regardless of the human presence. It's a big stormy lake and you can't change that. The erosion that campers do cause could probably be minimized by education just as educating the campers has reduced the bear conflicts. I have only personally only seen one bear on Stockton - near the beach at Julian Bay. Never do I recall hearing of any recent incidents in the campsites. My observation is that most campers are doing a good job with camp cleanliness and bear locker usage. There's always going to be some ignorant campers, but moving the campsites won't change that.</p> <p>I hope you will reconsider the relocation of the Presque Isle campsites. They are truly a special draw that keeps me thinking of the Apostles all year long and planning my next</p>	10/23/2009		<p>Rudolph, Brian .</p> <p>Oregon, WI 53575 USA</p>

ID	Correspondence	Receipt Date	Org.	Name, Address Email
	<p>"escape".</p> <p>Sincerely, Brian Rudolph Oregon, WI</p>			
71	<p>1) We strongly encourage the development of more group sites in the Islands: Otter, Cat.</p> <p>2) We strongly encourage keeping the group site A on the south end Sand Spit of Oak Island. It would be a great loss to groups to put two group sites at the government dock. Put up a fence like the one on the camping site at Devil's Island to keep campers from running down the cliff and creating the erosion problem.</p> <p>3) On page 329 of the Draft General Management booklet under the Organizations and Businesses; update our name from Adventures In Perspective.</p> <p>4) Put in a latrine at the 'Lunch Beach' at the end of the Meyers's Road Sea Caves.</p> <p>5) Consult locally based CUA outfitters for safety regulations for kayaker in the Islands.</p> <p>Thank You.</p>	10/23/2009	Living Adventure Inc.	Green, Gail . P.O., Box 874 Bayfield, WI 54814 USA
72	<p>October 23, 2009 Apostle Islands National Lakeshore General Management Plan National Park Service Denver Service Center - P. Greg Jarvis PO BOX 25287 Denver, CO 80225</p> <p>Dear Mr. Jarvis, I have reviewed the NPS Draft General Management Plan for the Apostle Islands National Lakeshore in Wisconsin and first I must thank all those who worked so diligently to produce such a comprehensive and clearly written document. I am offering you my response and wish specifically to comment on "Alternative 2, The Preferred Alternative." Thank you for inviting me and everyone else to do so.</p> <p>My husband and I have a home in Bayfield, WI spending about half of the year here and the balance of time out of state. I think of myself as having the dual perspective of a visitor and of a resident.</p> <p>In September I took the opportunity to meet and talk with NPS staff on Stockton Island while attending an 'Open House' presentation of the Apostle Islands Draft General Management Plan. My husband and I chose that venue to participate because it gave us a chance to stay overnight on our boat at a safe harbor and spend two days on</p>	10/23/2009		Voss, Elisabeth E. P.O. Box 911 Bayfield, WI 54814 USA

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	<p>beautiful Stockton Island. I relish walking the Stockton trails resplendent with mosses and am fascinated by the variety of ecosystems on the island. Sitting on the pristine beach at Julian Bay is a restorative experience for me. I watched from shore as children and adults swam and splashed about while others napped or, like me, sat with a book on our beach blankets. I was by myself that afternoon while my husband hiked, but it was touching to observe the half-dozen families lounging together in close-knit groups spread out along the length of beach. I trust it was a memorable experience for each of us. At the meeting that evening, hosted by Superintendent Krumenaker, I appreciated meeting and speaking with the park rangers and hearing some of the comments and questions posed by other attendees. The other campers in attendance (15 or so by my estimate) were all very interested and engaged with the NPS staff in small groups asking questions and expressing their particular concerns. I'm always impressed by the variety of knowledgeable, interesting folks one meets in the APIS.</p> <p>Highlights from my own experiences in the Apostle Islands Park include:</p> <ul style="list-style-type: none"> <li>-touring both the Sand Island lighthouse and Raspberry Island lighthouse at times when there were NPS volunteers on hand and answering questions;</li> <li>-exploring the Manitou Fish Camp while learning some of the lore from a NPS volunteer and trying to imagine living in such sparse and tiny quarters;</li> <li>-kayaking to Basswood Island, eating our lunch at a picnic table overlooking the water and then walking to the old quarry site where beaver had moved in;</li> <li>-hiking the Lakeshore Trail above the sea caves as the thundering thud of water surged into the caves beneath our feet, a truly awesome sound;</li> <li>-cruising by the sea caves at sunset with eagles circling above and, another time, spotting a black bear fishing on the shore of Manitou Island;</li> <li>-attending many Monday night lectures at the Park Headquarters, co-sponsored by Friends of the Apostle Islands, to learn about mushrooms, Ojibwe history and raptors;</li> <li>-being present for a fabulous lecture and slide presentation at the Russell Town Hall (originally planned to be at the West Bay Club on Sand Island) where the story of Gertrude Wellisch and Plenty Charm cottage on Sand Island were told and now wanting to see Plenty Charm cottage restored to its full glory so it can be made available for Artist In Residence programs once again;</li> </ul>			

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	<p>-walking the Trombolo Trail on Stockton Island hearing the bizarre call of whooping cranes and then discovering a large bird of prey about 20 inches tall standing immobile directly on the path between us and a small bridge that we needed to cross. It stared, we stopped, and then slowly in single file the four of us passed within four feet of the beautiful large breasted tawny-colored bird that we think was likely, if not visibly, a sick or injured Goshawk. We were able to report it to a ranger we met later on the trail;</p> <p>-most recently, mooring at what is left of the Long Island dock and making our way ashore to discover the amazing Triplex Light Keepers quarters which although rapidly falling into serious disrepair would be a wonderful lodging facility if rehabilitated. If the dock and building were restored, the NPS could capitalize on Long Island's closer proximity to Ashland and Washburn, enhancing those cities' connectivity with the Apostle Islands. Certainly birders and lighthouse aficionados would value it.</p> <p>I love visiting the Park Headquarters. Monumental in scale and painstakingly restored, the historic Bayfield brownstone building is wholly appropriate as our National Park Service Headquarters. The august architecture of the building demands a tenant of equal standing. It is one of the first places we take out-of-town visitors. I find I never tire of seeing the excellent film about 'Gitchee Gumee' and the Apostle Islands shown there. Surely, there are creative ways to use that site to further meet the goals of a visitor center. I can envision outdoor activities and demonstrations on the grounds during festival times in Bayfield. Better signage and advertising directing people to the Visitor Center would help draw more people to the site. We do not need to spend millions of dollars erecting a new lakefront building location. You can see the lake right out front on Washington Ave. I would much rather see the NPS hire more staff and rangers and have them stationed at 'satellites' wherever needed or convenient, even temporarily, like the NPS booth we saw at Applefest. One knowledgeable and likable young Park Ranger who we saw again at 2009 Applefest had conducted a guided walk on Stockton Island the morning after the 'Open House' event in September and we were reminded of the delightful time we had when we joined him and the dozen or so people already in the group. I learned about bogs, plant identities and how the island was formed. The NPS could use about twenty more of him. The Everglades National Park is lucky to have this ranger during the winter. Additional well-trained and equipped personnel and park volunteers and partnerships will go a long way in promoting and preserving the APIS.</p> <p>If it really becomes necessary to relocate the Roys Point operations center and facilities, it is my hope that the City of Bayfield, the Red Cliff Band, the Bad River Band, the Bayfield Chamber of Commerce, Madeline Island Ferry Line, the Island Princess Tour Operator, the Coast Guard and the National Park Service could all find some ways to</p>			

ID	Correspondence	Receipt Date	Org.	Name, Address Email
	<p>partner with and support one another to meet shared goals for visitors to the area. I could see Park Service personnel hosting eco-tours or lecture series on the Island Princess for example. Ideally, the NPS and the other entities would come to consensus about how to best share or at least coordinate waterfront resource allocations. If NPS boats are split between Bayfield and Little Sand Bay it surely would be more fuel efficient than always departing from Bayfield to go to Sand Island, for example. If anything, the Little Sand Bay facility should be expanded. I don't see the wisdom in constructing a new Bayfield Visitor Center building when the existing one is excellent and could be supplemented easily enough while developing all kinds of island facility improvements and still come in below the \$27 million sited for a one-time expenditure under Alternative 2, The Preferred Plan.</p> <p>When my husband and I visited Rocky Island a couple of years ago, we were invited to see some of the cottages, we were regaled with local stories and we 'stuffed' ourselves at a fish-fry picnic that ended with birthday cake and song for a woman who so loves Rocky Island she made the trip out for her ninety-fifth (95th) birthday. As Denny Edwards and Julian Nelson and Jack Erickson, who were all there that day could attest "It is not we that own the land but the land that owns us." I strongly believe that every visitor can better understand the islands if they know what occurred on them in the past and hear the stories of those who lived and worked on them. Having that frame of reference is what enables us to appreciate the natural resources found throughout the islands, the waters and mainland and prices paid by people and by the wilderness. The stories are among the best teaching tools we have for understanding our role in conservation and preservation. Alongside the stories are the artifacts, the fishing camps and quarries, the farms and homes and lighthouses. Seeing is believing. Life on the islands is easily romanticized but seeing the historical evidence gives us context and we learn life was hard even in such gloriously beautiful surroundings. The future health of this ecosystem depends on all of us learning from those who came before us.</p> <p>I do not support the proposed Alternative 2, as it calls for enormous monetary resources to be dedicated to a new visitor center facility in Bayfield when those funds could pay for more staff and pay for improving/expanding existing facilities throughout the actual park. I believe more thought needs to be given to innovative and creative ways of administering staff and implementing programs with more emphasis on flexibility and mobility. I would support something closer to Alternative 3 if it were expanded to include additional trail development on Sand Island, restoration of the "former use and occupancy/current life estates" on Sand and Rocky Islands, restoration of the Long Island structures with emphasis on experiential education for the public.</p>			

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	<p>I believe the NPS should 1) put its resources into preserving and maintaining the existing structures and artifacts on the islands that tell a story, 2) should make access to the islands a priority with designated trails as part of promoting "lake-oriented" recreation and, 3) should foster partner relationships to expand its mission. The National Park Service, Apostle Islands National Lakeshore will strengthen its outreach by continuing to explore and develop effective partnerships with the area's 'stakeholders' by including Conservancy groups; the Red Cliff and Bad River Tribes; those with close links to historic sites; community volunteers in general and its own staff and being committed to facilitating the above to enrich the experience of the visitor.</p> <p>Respectfully submitted, Elisabeth E. Voss</p>			
73	<p>In regards to the proposed General Management Plan at The Apostle Islands National Lakeshore:</p> <p>It has come to our attention that several changes are proposed for The Apostle Islands National Lakeshore. While we find most are acceptable, one proposed changes upsets us greatly: the proposal to move the campground on Stockton Island off the beach.</p> <p>Simply put, having the string of campsites along one of the country's most beautiful strips of sandy beach is what makes this a treasured vacation for us. That beach is what we travel to see, to soak up, to rejuvenate.</p> <p>We are conscious of environmental erosion and we do what we can to leave no trace. We teach our daughter about protecting all that is sacred about our earth and were amicable to this year's closing some of the sites where erosion is severe and where there may be archeological information about our ancestors. It makes sense that people have been living on that strip for thousands of years. We hope that we don't have to change that now. It is, clearly, the most perfect place on the island to camp.</p> <p>If money is the issue, please just charge more to all who use the area. We are by no means affluent, but we are agreeable to paying a fair price to retain something that is as beautiful as the current campground sites. If you must shut down some of the sites, so be it. But we plead of you to keep them open so our family can continue to choose to spend summer vacation on our beautiful island. If the campground were moved up to Presque Isle, we would not spend the extra expense of the ferry to get to Stockton, and would likely just choose a state or private campground instead.</p> <p>We sincerely hope you will retain the beautiful beach sites at Stockton.</p>	10/23/2009		<p>Kept Private Kept Private Minneapolis, MN 55407 USA Kept Private</p>

ID	Correspondence	Receipt Date	Org.	Name, Address Email
	Thank you,			
74	<p>To the folks whom make a difference,</p> <p>I have been paddling the better half of my life and one of my earliest paddling memories was my first experience paddling in the Apostle Islands. I have since been held captive by this geographic locations' pristine presence and iconic influence upon the surrounding and afar communities.</p> <p>I have been a resident of the area since 2003 and have served many years as a sea kayak guide for a local company. In the summer of 2008 my partner (also a guide for local company) and I departed from the Bayfield waters of the Apostle Islands to paddle around the Lake and return to familiar ground three months later. It was a mind blowing experience.</p> <p>Not only does Lake Superior have a lot to offer, but the Apostle Islands can be a refuge against the lakes mighty forces. More importantly it is one of the areas that is fairly accessible for people of all abilities. As well there are opportunities for folks of all abilities to enjoy the Apostle Island National Lake Shore. With Ken Burn's popular film series on the National parks captivating the country on our 'wild' areas I think its only imperative to consider what's best for the park and the visitors which recreate within its boundaries.</p> <p>As a paddler I look at the proposed plan with careful eyes. I have experienced many a pleasurable journey in the islands and I have been humbled an equal amount of times. Leading others into the beauty of the beast can add additional perspective, which I think may affect my total compliance with the 'preferred' plan.</p> <p>First I have to wonder how much impact is too much? The idea of providing a quick and easy way to get people on the islands seems like a devil in disguise. Would the park service be chartering these voyages or would it be via a private outfit. It seems as though if this were to economically benefit the park service it may be a good idea so long as the numbers are fairly limited; as heightened impact on SAND and BASSWOOD would turn these islands (which are already close to the mainland and easy to access) into a super highway of human use. It could lead to people straying from the beaten path and further causing detriment to the environment, in addition to causing harm to themselves or others as they use poor judgement, costing the park service additional funds w/ search and rescue efforts. It may also warrant the potential for people to opt out of their journeys and catch a 'ride' because they are unmotivated to paddle back to the mainland. These can be a few negative aspects of a non definitive plan for 'new transportation opportunities'. Make sure it benefits the park first - end of story</p>	10/23/2009		<p>Kept Private</p> <p>Kept Private</p> <p>Bayfield, WI 54814</p> <p>USA</p> <p>Kept Private</p>

ID	Correspondence	Receipt Date	Org.	Name, Address Email
	<p>Second I have to voice that taking the OAK A group campsite from its current locale and moving it between the dock and the sand spit is would cause unneeded burden on adventures to the islands. On many occasions the wind can wrap through that north channel and cause unpredictable wind currents and waves, which, after a long day of paddling can overwhelm folks heading to the island. After a burly crossing or audacious wind, the last thing people want to do is hike into a site that may not offer such a pleasant view and resource base. The site sits atop a grassy area away from the individual site and provides campers with a vault toilet and ease of water purification. If one were to move the site, couldn't they hypothetically swap the locals of the group and the individual site? It seems that would still provide necessary benefits sans re locating an entire group site and creating a large hike. Or better yet would one be able to make an appeal for that specific site, allow it to say the way it is and per chance trade an equal parcel of land in the non wilderness area for it?</p> <p>Its a battle, I understand, but taking that group site from the potential of use (there are not that many) would be a travesty. It exonerates the ambiance of the Apostles, secluding you from others and the landscape of the mainland. Its what keeps some people coming back and actually caring for the area. Don't we owe it to the islands to preserve it? PLEASE DO NOT CLOSE IT!</p> <p>The Lighthouses: SUPPORT on the PLAN</p> <p>The historical buildings; SUPPORT on the PLAN</p> <p>The Visitor Centers: Great ideas there, but I think they would be most easily accessed in town. This is tricky because the land/ building is expensive, but it would definitively reach a wider audience than if it were elsewhere.</p> <p>Last the campsite issue at Stockton Island Presuqe Isle is a tricky one. I do agree that the erosion issue is of definite concern, but creating an entire new campground seems equally invasive. Is there a way to minimize the number of campsites, have a few DESIGNATED paths from the beach to said campsites and potentially keep create a few sites within walking distance from the dock. It seems, and I speak from experience that after a long haul to Stockton the last thing you want to do is jockey for a site or have to walk excessively to said campsite. I would support creating a few sites within close proximity of the dock (or using those campsites for folks whom arrive on the shuttle) and creating a few definitive path ways to minimize the chaos of constant clambering up the hill. Also perchance one could look into low profile fencing to control the traffic and reduce erosion.</p> <p>Thanks for taking the time to hear what the folks of the</p>			

ID	Correspondence	Receipt Date	Org.	Name, Address Email
	land have to say. I look forward to many more years enjoying what the AINLS has to offer, sharing it with others and doing what I can to preserve what can only be described as a completely unique and diverse environment. Let's keep it that way.			
76	<p>To: Superintendent Bob Krumenaker, Apostle Islands National Lakeshore Re: NPS Alternatives for Non-Wilderness Areas in the General Managment Plan</p> <p>Dear Superintendent Krumenaker,</p> <p>As a realist, I understand that one of "the only thing guaranteed in life is change". However, in the case of relocating the Stockton Island campground, I sincerely hope that the NPS will reconsider this proposed change and allow the campground to stay where it is currently.</p> <p>It is the beach sites that cause such a draw for us to camp there. It has become quite the tradition for our family. We have come to know in community some of the other campers who often camp the same week we do. However, one of the reasons we like camping there, is that our campsite is not right next to other campsites. We like the peace and quite and that would not be the same if it were moved up to Presque Isle. The terrain up on Presque Isle is vastly different than along the beach. No blueberries, lots of bugs, and simply different foliage. Not having the beach close by would be heartbreaking. If I wanted to camp on a cliff, I would not spend the ferry money to get out to Stockton. We can't go to Oak Island or some of the others because we have no boat. We are highly experienced campers. We've winter camped, spend time in spring and fall in the BWCA, and have camped in a number of other countries. Truly, the beach on Stockton is our favorite, and an annual pilgrimage. To eliminate the ability to camp on the beach would be to eliminate our interest in visiting Stockton.</p> <p>Yes, change may need to happen, and can often be for good. To preserve that which needs to be preserved for future generations, and to be good stewards for that which we have been entrusted. But like the PBS documentary has recently brought to our public consciousness, our parks are meant for all of us, and especially should be available to those who are not wealthy and therefore unable to "buy" other experiences. They need to be beautiful in the future, yes, but also in the present. To do so, then we must teach people how to act in their environment. I would rather some campsites be closed, like 14 was this year and other fencing was erected at other sites. There are other manners in which to discourage people from making their own trails. Post them, so that people know what consequences will be if rules are broken. I think people will adhere to them better if they</p>	10/23/2009		<p>Travis, Monica . 3221 Columbus Ave #1 Minneapolis, MN 55407 USA monicatavis03@yahoo.com</p>

ID	Correspondence	Receipt Date	Org.	Name, Address Email
	<p>knew that consequences would be as severe as relocating the campground. To do this well, does require money and staffing. Most campers and boaters should understand that. Please just charge us so that the NPS can provide the best service possible. We are happy to pay for the experience and we just don't want the experience taken away. Please keep the Stockton Island campsite where it is currently.</p> <p>Thank you,</p> <p>Monica Travis</p>			
77	<p>I am a resident of the Town of Russell and a Bayfield County Board Member.</p> <p>I urge you to follow the NO Action recommendation.</p> <p>I am very concerned that Bayfield County was not included or consulted regarding this Management Plan other than the public comment period. As an elected official representing the majority of the residents living within or adjacent to the park, I have grave concerns with the plans to dramatically change the parks presence within the Town of Russell. Little Sand Bay is the gateway to the park for the majority of kayakers and recreational boaters. Any change in operations at Little Sand Bay will negatively affect local residents and park users.</p> <p>Also, the Red Cliff Band of Lake Superior Chippewa and the Town of Russell should have been an active partner in the development of this plan. Does the park service choose to ignore other governments?</p> <p>As far as expanding in the City of Bayfield goes I strongly oppose that action.</p> <p>The majority of the park operations are currently not even in the park! Why, when the park can not maintain current facilities, would you build more in the City of Bayfield. As far as building a maintenace center in the City, that is a poor use of limited lakeshore and an eye sore for the City. Roys Point Marina, the current maintenance facility, is closer to the islands than the City and the facility is out of public view. It should continue as the maintenance center or it could be relocated to Little Sand Bay.</p> <p>I request that the NPS start this process over and include local input from local governemt and the Tribe.</p> <p>Hopefully this would result in a managemet plan that best serves not only the park but the local residents, park visitors, the Town of Russell, Bayfield County and the Tribe.</p> <p>Sincerely: David L. Good</p>	10/23/2009		<p>Good, David L. 94500 N Ladd St Bayfield, WI 54814 USA DaveGood@centurytel.net</p>

ID	Correspondence	Receipt Date	Org.	Name, Address Email
	Bayfield County Board Supervisor - District 1 Town of Russell - Clerk/Treasurer Town of Bayfield - Clerk			
78	Having had the pleasure of visiting the Apostle Islands, it is my hope that the NPS will support efforts to preserve the historic properties in the park and to do so through cooperative agreements with local community groups and the people with historic ties to the Islands. The fact that the NPS is underfunded and can benefit from assistance from local community groups to preserve these historic symbols only goes to underscore the importance of working together with these local groups. It is my hope, that in so doing, future generations may have the opportunity to see living history on these islands, and that this legacy is not lost to history.	10/23/2009		Kept Private Kept Private Arlington, VA 22201 USA Kept Private
79	Mr. Greg Jarvis-  I have spent a lifetime visiting the Apostle Islands, and as a member of one of the historic use families, I have many fond memories of the Islands and their many beauties. Many of the points made in the new Draft General Management Plan are solid, but several raise concerns for me.  I am pleased at the mention of the need for historic preservation within the park, but I worry that the statements made to maintain and restore the buildings of the park are not strong enough. From what I have seen in the past, it does not seem as if the NPS is capable of this important task by itself. I have seen numerous historic and important buildings within the park fall into such disrepair that this eventually leads to demolition. I worry about the NPS ability to maintain and promote this human story within the park -- something that is as important to the islands as their natural beauty.  It is my belief that the NPS must find willing and able partners to help in the task of historic preservation. As a member of a family with a long and well documented commitment to the preservation of Sand Island and the other Apostle Islands, I can think of no better advocates than those of us already doing much of this important work. Please consider reaching out to this resource and giving it stronger priority in the new Management Plan.  Thank you,	10/23/2009		Kept Private Kept Private Saint Paul, MN 55105 USA Kept Private
80	Good afternoon,  Thank you for allowing me to comment on the APIS General Management Plan from the summer of 2009.  I would like to address the proposal to relocate the Presque Isle campsites on Stockton Island. IF the Tombolo camp sites are removed I am certain that there will be a	10/23/2009		Kept Private Kept Private Fitchburg, WI 53711 USA Kept Private

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	<p>significant drop in campsite usage on Stockton Island, and a subsequent loss in campsite park fees and ferry fees.</p> <p>I understand the declared issues to be erosion concerns and bear habitat protection. I also understand that one of the intents of the management plan is to promote enjoyment of the islands by visitors, and perhaps increase visitor use.</p> <p>Camping on Stockton Island is not for the faint of heart. If you go by personal boat, you're limited to what you can store in your kayak or fishing boat. If you take the ferry, you pay \$80/adult \$50/ child round trip fee PLUS kayak hauling fee. You must then carry all of your camping gear from the dock up to 3/4 mile through fern lined treed trails to your campsite. Stockton Island has potable water, which increases the length of time one can camp (you don't have to bring in your own water). The pump is next to the ranger's station, and so the water must be carried - again - up to 3/4 mile to your campsite. Several pit toilets are stationed along the path servicing the campsites - again a walk. Special care must be taken when camping on Stockton. All of your food and toiletries must be locked into bear proof lockers when not in use. Extra clean-up is required after every meal, no toiletries (not even chapstick) can be left in a tent.</p> <p>People go to Stockton Island because they appreciate and even crave wild places. Present campsites on Presque Isle bay provide some of the best camping scenery I've ever experienced. The campsites sit up from the beach (5-30 feet depending on the site). They are well-spaced and so provide a truly natural setting. (i.e. private). The beach provides a protected and shallow swimming area. The westerly facing advantage allows the prevailing winds to blow most of the bugs away. The views are unforgettable. You cook dinner to a view of your children swimming, sailboats mooring, late afternoon kayakers returning to camp.... The sun spreads swaths of orange over the bay while you're cleaning camp for the evening - and you know everything is good in the world. If you awake on a clear night you may catch moonbeams playing with the waves between the islands. Loons call out and bald eagles soar overhead.</p> <p>I have camped at the Presque Isle sites with my family 3 different summers (for about a week each) over the past 6 years. These camping experiences have fulfilled the intent of our National Park System, by instilling in my children a sense of wonder and respect for the environment, the importance of minimum impact camping, respect and care of native environments and creatures. Stockton Island has also provided them with a balance to their technologically stimulating "regular" life. My daughter turned 17 last June - she begged all last year for our family to return to Stockton Island for a camping trip. It is her "favorite place on earth."</p> <p>We understood from the rangers this past summer that</p>			

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	<p>there were NO bear sightings on Stockton Island last year. I've never seen or heard of a bear in a campsite on Stockton. The one bear I saw the first year we camped there was on the other side of the island from the campsites. The rangers are good at educating and enforcing the camping rules - and should continue to do so. It would even be appropriate to require some erosion education to campers prior to their departure for Stockton Island. It is worthy of protection.</p> <p>There is no need to attempt to increase the use of Stockton Island by the public. Presently, campers area provided with a natural and uncrowded experience. Increasing usage will destroy the sense of Wilderness.</p> <p>I have noticed the erosion that has occurred in the time that I've been camping on Stockton Island, but my belief is that the majority of the erosion occurs during winter lake storms. Lake Superior is truly a GREAT LAKE, and mother nature is a force to be respected. We were camping on Stockton Island the year the storms hit Bayfield during the August Art festival. Art booths went rolling into the harbor in Bayfield. Those of us hunkering down in tents on Stockton during the torrential rains and high winds were reminded of our need to respect the laws of nature. However, the beach did not suffer any erosion. Human erosion (kids previously taking shortcuts to the beach) is not causing the loss of 10-20-30 feet of beach front erosion. The park should continue and even heighten their efforts to minimize human erosion of the TOMBOLO dunes through fencing, decreasing water access, and camper education. To think that moving the campsites from the Tombolo will stop the erosion is foolish. The lake will do what it will.</p> <p>The proposed new campsites are on the easternmost end of the island, on a rounded point facing Michigan Island. Most of the sites will not be at the water's edge (and for good reason - there are sheer cliff drop-offs to the water below with no access back to dry land). There will be no sunset views, no prevailing winds to ease the bugs. Stockton may hold the official record of having the most black bears per square area in the US. However, it surely holds the unofficial title of densest biting bug population. Hiking inland on Stockton causes many survivors to seek blood transfusions. My family and friends still complain about the hike I led to Trout Point (on seldom used trails through the center of the island) six years ago! Though the view out into Lake Superior that sunny summer day- with not a boat, nor a plane, nor an airplane cloud trail is something they also won't forget.</p> <p>Those that know and love Stockton Island won't camp in the new sites - because they know they will be uninhabitable and they can't replace the gems they've become used to. Those new to the island will probably leave early, or just leave with unpleasant memories.</p>			

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	Our family is saddened by the thought that we may have camped on Stockton Island for the last time. I hope you reconsider your decision to move the campsites on Stockton Island and seek an alternative that both protects the island and it's access by respectful campers.			
81	I just recently learned of plans of NPS for changes at Apostle Islands. My particular concern is the camp sites at Stockton Island. The attraction of these sites is their location on the Lake. I have heard the plan is to move them inland. An inland location would make them like thousands of other campsites, and eliminate what makes them so special. Please do what can be done to retain their "specialness" by keeping them on the lakefront.	10/23/2009		N/A, Greg .  Duluth, MN 55808 USA
83	<p>It appears as though the team did a very good job on the General Development Plan, however none of the suggested outcomes covers all those areas I am concerned with.</p> <p>I was born and raised on Sand Island and even though I have been away for years, I consider that my home. I don't understand why educational gatherings can't be held within the wilderness areas? What else is the park there for?</p> <p>I also know every one of the life esatate holders and most have done an outstanding job maintaining the property for the ultimate enjoyment of the public.</p> <p>I am a firm and vocal advocate for the presiveration of the historic structures within the bounderies of the park. They help to illimuate and educate the public those who lived on and enjoyed this beautiful plase before the park existed. Most historic structures would be irreplaceable were they to be left to "moulder."</p>	10/23/2009		Dahl, Robert . 11579 Mandarin Cove Lane Jacksonville, FL 32223 USA bobdahl@hotmail.com
86	<p>Access to the islands is an important issue and one that needs to be balanced with both wilderness preservation and historical preservation of our culture's relationship with the land. Meeting the needs of our National Park visitors should be accomplished in a way that compliments our area's community and business resources, both existing and potential.</p> <p>The decision that the Park Service makes regarding the 2009 Draft GMP will likely have a profound effect on our area's economy. In light of this, it would be beneficial to have a formal group of community partners that could act as a consultative body for the Park Service on such matters. I would recommend that the partners include representatives from: Red Cliff Town of Bell Town of Russell Town of Bayfield City of Bayfield</p>	10/23/2009	Bayfield County Tourism & Recreation	Motiff, Mary D. 117 E. 5th Street PO Box 832 Washburn, WI 54891 USA mmotiff@bayfieldcoun ty.org

ID	Correspondence	Receipt Date	Org.	Name, Address Email
	<p>Bayfield Chamber of Commerce &amp; Visitor Bureau Bayfield County Tourism &amp; Recreation Bayfield County Economic Development Corporation</p> <p>I regret to inform you that the Bayfield County Tourism &amp; Recreation Department has not been actively engaged in the planning process for the Apostle Islands National Lakeshore General Management Plan and therefore cannot offer support for any of the alternatives at this time.</p> <p>I would appreciate the opportunity to discuss the elements of the plan in some detail with the planning team before any decisions are made.</p> <p>Thank you for your consideration of this request.</p>			
87	<p>First, Thank you for the opportunity to comment on your Draft General Management Plan, Wilderness Management Plan and Environmental Impact Statement.</p> <p>A. I didn't see any mention of the Memorandum of Understanding with APIS, Northland College and its Sigurd Olson Environmental Institute and Outdoor Education Program to collaboratively deliver the Apostle Islands School</p> <p>B. Desired Conditions - Chapter One - Water Quality</p> <p>Park Commitment to Water Quality: You state, "NPS staff will continue to educate boaters about current regulations and risks posed by....human waste discharge....</p> <p>Further, "Best manage practices will be applied in the park...</p> <p>Clearly, you need to address the issue of human waste at the beach just east of the mainland sea caves. I believe your successful experiment with the composting biff on Cat Island can and should be applied there - Probably in at least 2 locations at the sight. There may be more visitors there than you have at Raspberry Island on a busy day in the summer.</p> <p>C. Group Campsites. proposing no new group campsites seems "short sited." sorry.... One of the reasons the group campsites now are so congested is because there are so few of them and they are concentrated in the inner islands. If you spread out the impact of groups among more islands you will reduce the pressure on any one of them. I would proposed group sites on Rocky, South Twin, Otter, a second group site on the North end of Basswood and a second group campsite on Sand in West Bay when that property comes into APIS use. Further, I would keep the Oak A campsite and use it as a demonstration/interpretive site for recreational damage to the resource. In addition I think restoration work on eroded slope could be undertaking at this site concurrently with the interpretation.</p>	10/23/2009	Sigurd Olson Environmental Institute	<p>Herman, Grant P. 1411 Ellis Ave Northland College Ashland, WI 54806 USA gherman@northland.edu</p>

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	<p>D. Complete trail between Meyers beach and Little Sand bay staying on APIS land (south of reservation properties) before returning to the coastal area. I see in your plan that you considered building a bridge over the mouth of the river. I am glad you abandoned this plan. It is Red Cliff land to begin with and would create a visual and natural resource sore spot. However, I would recommend moving the trail inland there staying on Park land and providing a much smaller pedestrian bridge where the river is much narrower. Your 400 foot bridge could probably be more like 40 or less. I believe your conclusion to forgo pursuing property easements is taking the easy way out. It wasn't easy to create the park either so despite the expected difficulty, I would recommend pursuing it. A further alternative would be to develop a model for a "floatable" moveable path through the wetland. One that would be changed on a "regular" basis say every 3-5 years. Sections of trail that are clipped together essentially and designed to be adjusted to the variation of wetland travel.</p> <p>E. Stormwater runoff from Park Facilities. Retention ponds/swales need to be constructed to mitigate parking lot runoff at Meyers Beach, multiple locations at Little Sand Bay, Roy's point if you keep it. the worst of this is brake pad runoff (mercury and other heavy metals) during the summer season. Obviously salt in the winter at year round facilities.</p> <p>F. I would recommend backing off of not letting people fish within park boundaries from Snow machines. While I don't ride them myself I think the spirit of fishing that these people display is within the intent of park fish regulations. Restricting their land use is still appropriate.</p> <p>G. Public Health: Please do away with the Serve Safe certification require now of professional guides in the park. This certification is aimed at commercial cooks/kitchen and has no bearing on reality of providing safely prepared food in the wilderness. What you need to do is certify the programs/businesses to be serve safe so their food management staff can take the training and pass on and adapt the relevant policies for maintaining a high standard of public health.</p> <p>H. Lightscape Management - I would fold this into your sustainability policies so that dark sky lighting across all facilities in the Park is still an active goal over the range of this plan.</p> <p>I. Interpretation, Education and Permits pg. 92 I believe you are referring to formal park education and interpretive programs when you state "All education and interpretive efforts will be located outside the wilderness area." All is misleading here. Certainly educational oriented groups, like those from Northland College and its Sigurd Olson Environmental Institute would plan to continue performing educational and interpretive acts in the Wilderness area.</p>			

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	<p>To leave this vague is to suggest that the concept and practice of wilderness is somehow separate from learning. As a largely educational agency yourself, I assume you understand this. So I recommend changing the language here to reflect that you don't want permanent interpretive structures anywhere in the Wilderness area. I am in agreement on that point but let's not throw out learning with a restriction on interpretive structures.</p> <p>J. Individual campsites; I would recommend beginning to give these sites "term limits" of maybe 10 years or so to give the existing sites time to restore the impact of continued recreational use. You could stagger the start up dates beginning with the most impacted and adjusting as you move along. New sites would not have to be far from old sites necessarily depending on availability but this would build the concept of restoration back into campsite management.</p> <p>K. More Trails. In addition to completing the Mainland trail which I would rate as a necessity to increase the quality and frequency visitor experience, I would also advocate for three additional trails in the park: First, the Sand Island trail to the West Bay Club is a great idea although I would recommend turning that into a group camping site rather than preserving those buildings or perhaps using the building as an interpretive site to serve the campers there (probably too expensive) Second I would create a shoreline trail on Bear Island between the South Sand spit (when it comes into Park use) and the sand beach on the NE quarter of the island. Both trail ends could be primitive individual camp sites; finally I would connect the south sand spit on Cat to the long beach on the NE quarter with a shoreline trail. Almost forgot - I would build a shoreline trail on the east side of basswood between the new group campsite on the North end to the exiting quarry/group campsite trail.</p> <p>So, overall I think that leaves me between Alternatives 3 &amp; 4. Neither addresses all the important issues I think support user issues but either a combo would be good.</p> <p>Additionally, I thought the interpretive agenda (unless I missed it) seemed rather weak. I think the park should have some on-water interpreters. In a perfect world, I would put them on a relatively small sail boat (so they can interpret for the sailing community and have a couple of folding kayaks on board to interpret for the paddling and camping visitors. I think the potential for interpretation to the power boat community is already there since the park already has so many power boats. Further I believe you could do some interesting interpretation around the science research issues that go on every season e.g. if you are monitoring soil erosion in overused campsites, make a program out of it. If you are assessing invasives in the bog at Julian Bay, make a program out of it. When the water is warm do a snorkeling program to the Noque Bay. In short, I think you could put together an interpretive</p>			

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	<p>series that might have a different tour every day or 3 times a week or just on Saturdays or something like that. Charge for it and use piloted interpretive rangers to run them so you don't have to pay for more than one person. Lastly, I just ache for an interpretive program built around commercial fishing. Can't you see a park service interpreter working with a crusty native fisherman to provide a deep and genuine learning experience that educate visitors about this on-going slice of history. You could collaborate with Red Cliff or with any commercial company for boat time. I think it would help support the local fishing community but making their fishing efforts more sustainable (because if you sell a program you still could make some money even when you catch no fish....) This idea would provide another opportunity wot work with Northland Faculty, students and SOEI staff. I would also like to see the park work with Red Cliff to interpret the fur trade. It is such a rich history ranging from the romantic to the tragic. I know the island museum interprets in in a museum sense but nothing where you are out there in the National Lakeshore. Food for thought.</p> <p>More good stuff.</p> <p>I love your developing focus on sustainability, climate change adaptation, ecological resiliency, developing new programs and restorations for at least one more if not two lighthouses (I would suggest Sand when you have to choose). I love the idea of the Wilderness Recovery strategy although you seem to be too restrictive here. Wilderness has had people in it for millions of years so I think it is unrealistic to not let them really get in there and feel it. While trails carve out a small mark through wilderness they create access to what wilderness really is - a recharge for the human spirit. I think a few more trails and you may start to get more hikers up here which is a great group of people to have in your park. They tend to be pretty resource conscious and tend to support wilderness.</p> <p>Selfishly, I would like to build on our exiting MOU to include collaborations with science and social science faculty at Northland College and with Sigurd Olson staff for citizen science, environmental Education and resource and resource use monitoring programs.</p> <p>I would recommend that the Park collaborate with the City of Bayfield, Washburn, Ashland and regional Marinas from Saxon Harbor all the way around Chequamegon Bay to Port Wing to support Boat washing/cleaning stations at all boat ramps. Further, to collaborate with all efforts that promote the regulation of ballast water in Lake Superior.</p> <p>Good luck with the next steps of your plan.</p> <p>Grant Herman Director, Sigurd Olson Environmental Institute Northland College Ashland, WI 54806</p>			

ID	Correspondence	Receipt Date	Org.	Name, Address Email
89	<p>Thank you for the opportunity to comment on the Apostle's Draft Management Plan. We would particularly like to address preferred alternative 2 with our following opinions:</p> <p>Points that we strongly support in Alternative #2</p> <p>On the islands</p> <p>Its goal "to provide more opportunities for more people to have an island experience" but we'd like to add alternative # 3's goal "to better support primitive lake-oriented recreation" to help better define what those opportunities should entail. This better upholds the legal history and purposes for the establishment of the park calling for the islands to continue to be wild and with minimum facilities. The original intent therefore was to save the islands from any further development from tourism, farming, logging, and homes. Keeping that in mind we support only minimal development in the form of docks and trails, and the restoration of all existing lighthouses.</p> <p>Specifically, noteworthy improvements supporting the goal set above include:</p> <p>§ New Trails on Sand Island to the lighthouse and from the west Bay Club to the east side to improve day use opportunities for a fairly accessible island out of Little Sand Bay.</p> <p>§ New Campsites - a few new campsites on Sand, Oak and Basswood/the inner more accessible and easier to maintain islands, as long as they are designed in concert with the elements of what makes an island experience in this park unlike any other. This would include great lake views in a private and personal setting with a feeling of remoteness unfound on the mainland. Where else in heartland USA can you be surrounded by a wilderness as big, vast, and untamed as Lake Superior&amp;the very tributes that attracted those before us in the area's history.</p> <p>§ Improvements to Historical Structures Contributing significantly to this unique "island experience" is the history of the lighthouses, therefore we agree that every lighthouse should be stabilized and maintained. Money should be designated for the restoration/renovation and interpretation of Sand Island light while continuing to make Raspberry Light a valuable destination. This would be a logical choice considering the above proposed trails and campsites and fairly easy access for day use. In addition, retrofitting it for overnight guests would add a new recreational opportunity in line with this alternative's goal but it should not be a drain on park resources nor run as a private proprietary venture in conflict with the park's legislative intent. Clearing of vegetation around the lighthouses to an agreed upon historical date would be a good thing and would, in our opinion, only add to the imagined lure of the lake in the times of early shipping. We</p>	10/23/2009		<p>Peterson, Mark and Erica . 709 Hall Avenue Birchwood, MN 55110 USA cassiachad@comcast.net</p>

ID	Correspondence	Receipt Date	Org.	Name, Address Email
	<p>also feel that after Sand Island Light, Michigan should be next in line for improvements.</p> <p>§ Emphasizing Day use points of interest The APIS could do much more with non-personal interpretation promoting self- discovery, somewhat proposed in this alternative. Providing dock space with a trail, access to a sandscape or significant feature (i.e. rock formation, brownstone quarry, historical feature) or a picnic area greatly enhances the unique visitor experience only afforded here. Manitou fish camp is a great such place and an easy stop for any boater including kayaking. Stabilizing and rehabilitating it is necessary but so is a bigger emphasis on supporting it as a means to educate users.</p> <p>§ Dock Improvements at Sand Island, when available, is good in light of the above comments.</p> <p>§ Additional Employees Vital as long as they are present out in the islands during the tourist season and play a strong role in education via interpretation and safety regulation.</p> <p>§ Exploring New Transportation Options An issue that always needs revisiting and creative measures.</p> <p>On the Mainland</p> <p>Improvements to the dock at Little Sand Bay. Beach access ramp at Meyers Beach. Improving visitor services and interpretation at the Hokinson Fishery. Adding a group use area at Little Sand Bay Points that we strongly oppose in Alternative #2</p> <p>The relocation of Stockton Island Campground to Presque Isle This is one of the most incredible camping experiences in America and unduplicated at Presque Isle. We understand the concerns about erosion, bear/people conflicts, the cost of maintaining latrines, protecting historically significant artifacts, etc. but they are not worth the loss of this experience to future campers to the APIS and especially not until every solution is tried. Use of this area for camping has gone way back, possibly to the Woodland Indian period. It has always been a traditional gathering place. All who have camped there have done so for the same reasons and nearly duplicated the same experiences. The tombolo has survived hundreds of years of people treading up and down its banks, collecting firewood, having fires, collecting berries, pitching tents&amp;and has still retained its innate beauty and attraction. Important is not exceeding an acceptable capacity and treading it as lightly as possibly. Education can play a huge role, fences and signs help, and attitudes with purpose can accomplish a lot. Self-composting toilets may answer pumping out latrines, packing out everything that you bring is becoming a moral obligation as is leaving no trace. Campers out west and in the east are becoming more</p>			

ID	Correspondence	Receipt Date	Org.	Name, Address Email
	<p>aware of how to avoid bear confrontations with their food. In contrast a move to Presque Isle will impact a mature boreal/deciduous forest, home to some important breeding birds in decline in the north. To many it would be camping in a forest much like on the mainland. The mosquitoes and the lack of view, and space is probably why it was never chosen as a Native American camping area. Staying at the tombolo could present an important interpretive message that visitors will take home with them.</p> <p>Rehabilitating the Long Island Light Station for NPS Housing We agree that a better presence of the NPS on Long Island "to reduce visitor disturbance and aid in monitoring piping plovers" is a good thing, but to rebuild the station and open it to staff housing seems incongruous to the intent. Tent platforms for researches, hidden back in the brush might blend in better with Long Island's personality. Funds might better go to the other light stations, ranger patrols and a roving naturalist on your busiest days. When we worked with Martin Hanson to add Long Island to the National Lakeshore, one of the reasons we used was to keep it wild. The original intent was not to develop this island.</p> <p>Putting additional funding into building structures on Sand Island at this time and exploring the possibility of visitor lodging at Camp Stella run by a concession. Rebuilding or improving any docks without considering how they can be designed so as to not significantly alter longshore drift of sand.</p> <p>Proposed changes at Little Sand Bay: We are agreed that with the visitation that the northern mainland is receiving, the present facility is not adequate. However we feel that replacing it with a smaller visitor contact station is not enough. The Hokinson Fishery is a wonderful interpretive introduction to the APIS and the Little Sand Bay visitor center area is the only mainland view of the wild APIS. Numerous opportunities for day use, environmental education, and lake-oriented recreation is available from this location. Near-by beaches, wetlands, sea caves, the dock and mementos of a past fishing era, and its close proximity to two lighthouses and Eagle Island all leave an impression with visitors. With so much opportunity this area should be a fitting destination and a stepping stone to how visitors can nearly experience the islands even if from the mainland. Therefore plans should include expanded facilities to include the Hokinson Fishery and more of an NPS presence, not less.</p> <p>Not considering mooring buoys We feel that they should be tried. They could reduce docking pressures and provide one more opportunity for lake-oriented and wilderness recreation. As far as safety, they are no more dangerous than docking.</p> <p>Missing Points in the Alternatives</p>			

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	<p>We were surprised that there was no mention of light-scapes preservation especially with talk of building new facilities on the mainland. The APIS are better than most places for observing the night sky.</p> <p>Adding more day-use points of interest should be emphasized. These could be included in a boating circle route brochure and map. These sites could include accessible walks, sand beaches and spits, old cabin sites&amp;see above.</p> <p>Specifically addressing areas that will be most affected by climate change and working to protect them when possible (i.e. Old hemlock groves, bogs, nesting habitats, water seepage into the ice caves from above, riparian habitats&amp;)</p> <p>Opportunities for land acquisitions on the mainland.</p> <p>The importance of continuing to support and expand the APIS School and giving local school children an opportunity to experience this wilderness in their back yard.</p> <p>Anticipating rising visitation by kayak groups and associated problems with backcountry use and abuse.</p>			
90	<p>This letter is to comment on the Draft General Management for the Apostle Islands National Lakeshore. I appreciate the opportunity to participate in the assessment of the plan and hope that my thoughts will be helpful to you. I should begin by identifying myself as the Director of the Minnesota Historical Society and Minnesota's State Historic Preservation Officer. Also relevant to your assessment of my comments is the fact that I visit the Lakeshore annually. Speaking both professionally and personally, I treasure the Apostle Islands National Lakeshore as a unique and very significant historic and natural resource.</p> <p>Speaking as a historian, my first concern is for preservation of the cultural resources. As a regular visitor to the Lakeshore I have some general knowledge of the buildings and human history associated with the area. I am particularly familiar with Sand Island. Knowing the Park Service's responsibility to preserve historic resources as well as natural ones, I urge you to keep this balance in mind as you move forward. In my many years of working as Minnesota's State Historic Preservation Officer and as a visitor to many of our national parks, I have observed that the Park Service has historically given greater weight to caring for our natural resources than for our historic treasures. I have experienced this in Minnesota in the long struggle to save the historic Stillwater Lift Bridge, which spans the St. Croix Wild River. And, I have observed the same phenomenon many times in our national parks. I can offer as a specific example the destruction of all of the back country chalets except for Sperry and Granite Park</p>	10/23/2009		<p>Kept Private Kept Private St. Paul, MN 55108 USA Kept Private</p>

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	<p>Chalets in Glacier National Park. Fortunately, these are stone buildings and their removal would have required a great effort and prohibitive financial expense. Thank goodness that these two magnificent chalets remain to help visitors understand the reasons for the creation of Glacier Park as an initiative of the Great Northern Railroad's plan to develop tourism along its routes in the west.</p> <p>In today's world of extreme financial exigency, I fear for the future of the historic resources at Apostle Islands. I urge you to evaluate them for their potential listing on the National Register of Historic Places; this assessment should be part of the agency's preservation planning for the Lakeshore. I disagree with the suggestion that the Park Service should limit its preservation efforts to those buildings for which the agency has use. I understand very well that the maintenance of the historic buildings will inevitably be costly, but I also know that there are ways to share this burden. Partnerships with the remaining private owners and others would make sense under these circumstances, especially during this period of financial stress in our nation. Unless the Park Service engages others in the responsibility of care, I worry that the buildings will quickly deteriorate beyond repair. In the harsh environment of Lake Superior, this will occur especially quickly. Allowing this to happen would be an abandonment of duty and a failure to keep faith with the American people. Partnerships are probably the only answer in the foreseeable future for the care of the fragile historic structures in the Apostle Islands Lakeshore.</p> <p>Along with the preservation of the historic structures, I urge the Park Service to preserve the human stories associated with them. To the extent that there are a number of people, many of them elderly, with living memory of inhabiting the Apostle Islands, these stories should be collected without delay.</p> <p>Finally, I wish to express my disagreement with the plan to remove the historic artifacts from the Lakeshore and transfer them to Houghton, Michigan for storage there. In my opinion, these objects should be cared for and remain in place in their historic context.</p> <p>With such a great need to preserve existing resources, the \$28 million proposal to build the new visitor center in Bayfield seems unwise. An appropriation of this size would go a long way toward accomplishing what I regard as the most important objectives for preserving the cultural resources in the Apostle Islands National Lakeshore. In summary, they are: 1) documentation and care of the historic structures; 2) collection and preservation of the stories documenting the human presence in the Apostle Islands; and 3) care for the lakeshore artifacts, allowing them to remain in their historic location. All of these responsibilities seem more important to me than construction of a new building.</p>			

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	<p>Looking at the plan through the lens of cultural resource preservation, I conclude that none of the alternatives presented really constitutes an acceptable course forward. I agree with the Park Service's stated goal to keep the Park as it is. In my opinion, the most cost effective way to accomplish this is to engage partners in the effort. The use of partnerships is an essential element in today's best practice for historic and natural resource preservation. I urge you to explore the possibilities to the fullest extent possible toward meeting your stated goal of preserving the Apostle Islands National Lakeshore resource.</p> <p>I appreciate your commitment to finding the best possible course for the preservation of the Apostle Islands National Lakeshore and trust that you will receive many helpful comments that will guide you in taking the next steps toward fulfilling your responsibility to the American people.</p>			

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# INDEX

air quality, 27, 55, 141

American Indian, 19, 22, 32, 34, 49, 59, 60, 62, 64, 69, 79, 81, 84, 85, 97, 125, 126, 145, 174, 192, 194, 195, 197, 199, 331, 332, 334, 336

Ashland, 6, 17, 19, 43, 48, 50, 192, 193, 195, 207, 208, 212, 213, 222, 229, 331, 332

Basswood Island , 15, 48, 75, 117, 125, 131, 133, 155, 174, 176, 177, 184, 192, 193, 197, 205, 206, 233, 252, 253, 254, 256, 258, 261, 267, 268, 270, 274, 277, 281, 283, 299, 302, 306, 308, 320, 325

Bayfield, 6, 16, 17, 19, 28, 38, 43, 49, 50, 51, 64, 67, 113, 114, 118, 123, 126, 131, 134, 148, 156, 167, 181, 188, 204, 206, 208, 210, 212, 213, 222, 229, 239, 247, 249, 252, 255, 261, 271, 273, 274, 275, 286, 296, 297, 298, 300, 302, 306, 308, 311, 312, 322, 323, 324, 325, 331, 332

Bayfield Visitor Center, 16, 50, 113, 123, 126, 156, 157

camping, 49, 67, 74, 79, 87, 101, 102, 106, 107, 108, 112, 116, 131, 133, 154, 181, 185, 203, 205, 206, 210, 234, 236, 240, 246, 247, 256, 263, 270, 271, 288, 295, 306, 313, 320, 325

cultural resources, 4, 13, 16, 21, 22, 26, 27, 34, 36, 37, 42, 43, 49, 51, 53, 68, 69, 74, 75, 84, 97, 98, 99, 100, 111, 114, 131, 140, 144, 145, 147, 149, 165, 205, 208, 210, 211, 217, 220, 250, 322, 364, 366

Devils Island, 170, 177, 184, 187, 205, 208, 211

endangered species, see threatened and endangered species

erosion, 26, 27, 47, 51, 53, 107, 109, 125, 134, 141, 142, 143, 149, 151, 158, 166, 167, 168, 169, 189, 190, 222, 230, 231, 232, 233, 241, 243, 245, 246, 250, 253, 254, 264, 267, 268, 276, 278, 279, 290, 292, 293, 300, 303, 304, 315, 317, 319, 326, 327, 364, 367, 368

ethnographic resources, 34, 60, 84, 97, 145, 149, 199, 230, 244, 245, 268, 269, 293, 294, 318, 319

fire, 21, 33, 47, 50, 68, 79, 81, 84, 92, 99, 103, 111, 133, 175, 192, 206, 210, 230, 242, 266, 291, 316, 365

flooding and floodplains, 30, 54, 142, 150, 170, 220, 234, 255, 280, 306

Hansen farm, 116, 124, 125, 133, 154, 193, 256, 265, 272, 277, 281, 290, 306, 316, 323, 325

hiking, 74, 79, 101, 126, 131, 156, 185, 205, 211, 234, 239, 246, 247, 256, 263, 270, 288, 295, 306, 313, 320

Hokenson fishery, 60, 113, 118, 126, 134, 187, 194, 242, 265, 290, 315

interpretation, 14, 25, 33, 35, 37, 38, 50, 68, 86, 91, 100, 112, 116, 117, 118, 119, 124, 125, 126, 127, 131, 133, 134, 135, 153, 190, 195, 207, 210, 241, 247, 248, 250, 264, 272, 273, 274, 276, 289, 295, 296, 297, 298, 300, 314, 322, 323, 324, 325, 326, 335

invasive species, 21, 22, 28, 39, 57, 69, 79, 81, 83, 141, 142, 174, 257, 282, 308

Little Sand Bay, v, 16, 19, 28, 38, 49, 50, 63, 107, 111, 112, 113, 114, 118, 123, 126, 131, 134, 135, 148, 150, 151, 156, 157, 167, 168, 170, 171, 175, 181, 194, 203, 204, 206, 207, 208, 209, 210, 211, 232, 233, 238, 242, 247, 249, 252, 254, 255, 256, 258, 261, 262, 265, 267, 268, 271, 272, 273, 274, 277, 279, 280, 281, 283, 286, 290, 296, 297, 298, 302, 304, 306, 308, 312, 315, 317, 318, 321, 322, 323, 324, 325, 557, 563

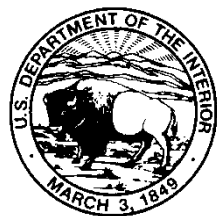
Little Sand Bay Visitor Center, 113, 118, 272, 296, 298, 322

- Long Island, 11, 15, 19, 48, 62, 75, 159, 160, 167, 169, 170, 173, 174, 175, 176, 177, 178, 179, 180, 184, 187, 188, 189, 197, 206, 231, 257, 259, 260, 261, 273, 281, 282, 284, 285, 286, 297, 307, 308, 309, 310, 311, 320, 323
- Manitou fish camp, iv, 112, 117, 125, 134, 147, 155, 187, 194, 272, 274, 298, 323, 324
- Manitou Island, 15, 177, 184, 194, 196, 205, 208, 211
- Meyers Beach, 49, 63, 107, 111, 112, 114, 118, 123, 126, 131, 134, 135, 148, 156, 157, 159, 167, 173, 175, 181, 203, 207, 210, 229, 235, 238, 248, 249, 252, 256, 257, 258, 259, 261, 262, 267, 268, 269, 271, 272, 273, 274, 277, 281, 282, 283, 284, 286, 292, 293, 296, 297, 298, 302, 306, 307, 308, 309, 310, 311, 312, 317, 318, 319, 321, 322, 323, 324
- Michigan Island, 15, 115, 117, 169, 170, 172, 174, 176, 177, 180, 184, 187, 188, 192, 193, 195, 197, 205, 206, 208, 211, 260, 264, 285, 311
- natural resources, 4, 12, 13, 21, 22, 30, 36, 40, 50, 53, 54, 66, 89, 96, 98, 99, 141, 148, 187, 217, 220, 251, 271, 276, 296, 300, 301, 321, 327, 350, 566, 571
- Northern Great Lakes Visitor Center, 11, 17, 38, 50, 113, 118, 126, 134, 203, 207, 208, 209, 247, 296, 322, 336
- Oak Island, 15, 43, 48, 106, 112, 114, 117, 118, 125, 133, 134, 148, 155, 156, 160, 166, 167, 171, 172, 174, 175, 176, 177, 184, 186, 195, 204, 205, 206, 209, 211, 238, 239, 240, 246, 252, 256, 257, 258, 259, 262, 263, 264, 270, 274, 281, 284, 286, 287, 288, 289, 292, 293, 295, 299, 312, 320, 321, 325, 565
- orientation, 37, 38, 50, 87, 111, 114, 118, 123, 126, 131, 134, 207, 208, 209, 247, 272, 296, 297, 298, 322, 323
- Otter Island, 15, 114, 167, 170, 172, 174, 184, 204, 205
- Outer Island, 15, 47, 49, 55, 57, 115, 166, 167, 170, 171, 172, 173, 174, 175, 176, 177, 178, 180, 184, 187, 188, 189, 195, 197, 204, 205, 206, 211, 241, 264, 289, 315, 562
- parking, 16, 28, 37, 43, 49, 102, 107, 142, 143, 203, 207, 227
- Raspberry Island, 15, 43, 47, 48, 112, 114, 115, 124, 131, 132, 133, 153, 166, 167, 170, 171, 172, 173, 174, 175, 176, 177, 184, 186, 187, 188, 189, 190, 191, 204, 205, 206, 208, 210, 211, 238, 240, 241, 242, 247, 263, 264, 266, 274, 288, 289, 290, 291, 297, 313, 314, 315, 316, 323, 561, 562
- religious practices, 34, 60, 79, 85, 197, 198, 199, 244, 268, 293, 318
- Rocky Island, 15, 47, 107, 114, 115, 116, 123, 124, 131, 133, 150, 167, 170, 172, 184, 192, 194, 204, 205, 206, 211, 238, 262, 265, 272, 286, 290, 294, 312, 315, 319, 323
- Sand Island, 15, 47, 48, 74, 75, 115, 116, 117, 123, 125, 131, 133, 150, 169, 170, 171, 172, 176, 177, 187, 188, 191, 192, 193, 194, 204, 206, 208, 209, 238, 252, 258, 262, 265, 267, 268, 270, 277, 281, 283, 286, 290, 294, 302, 306, 308, 312, 315, 319, 320, 325
- Stockton Island, 6, 15, 43, 48, 69, 114, 125, 131, 133, 147, 149, 155, 158, 159, 166, 167, 168, 170, 171, 172, 173, 174, 176, 177, 181, 184, 192, 195, 196, 204, 205, 206, 208, 209, 210, 211, 217, 229, 231, 232, 235, 236, 238, 248, 250, 252, 253, 254, 256, 257, 258, 259, 262, 267, 268, 270, 272, 273, 274, 277, 278, 281, 282, 284, 287, 293, 295, 297, 302, 303, 304, 307, 310, 312, 323, 331
- Stockton Island – Presque Isle campground, 48, 57, 117, 125, 147, 155, 158, 159, 181, 236, 250, 252, 254, 256, 257, 258, 259, 267, 268, 270, 273, 274, 276, 277, 278, 279, 281, 283, 284, 292, 293, 295, 297, 298, 300, 302, 303, 304, 307, 308, 309, 310, 317, 318, 320, 323, 324, 326
- Stockton Island Visitor Center, 50, 112, 114, 117, 123, 209, 247, 286, 296, 312, 322
- threatened and endangered species, 24, 55, 57, 69, 79, 81, 84, 92, 143, 144, 175, 178, 180, 220, 237

trails, 36, 43, 48, 59, 63, 79, 80, 88, 102, 103, 105, 106, 117, 125, 126, 133, 134, 141, 142, 143, 155, 156, 185, 192, 203, 204, 205, 208, 210, 211, 217, 227, 231, 234, 239, 243, 244, 248, 252, 255, 256, 258, 261, 263, 267, 268, 270, 272, 274, 276, 277, 281, 283, 286, 288, 292, 293, 295, 296, 297, 298, 299, 300, 302, 306, 308, 311, 313, 317, 318, 320, 323, 324, 325, 327, 350, 366, 368

vehicles, 16, 31, 40, 43, 50, 64, 80, 92, 141, 143, 181, 183, 204, 219, 236, 238, 239, 258, 260, 261, 262, 283, 285, 286, 287, 309, 311, 312

York Island, 15, 16, 48, 106, 167, 172, 174, 184, 186, 194, 240, 263, 288, 313



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