



# United States Department of the Interior

NATIONAL PARK SERVICE  
Apostle Islands National Lakeshore  
415 Washington Avenue  
Bayfield, Wisconsin 54814-9599

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November 3, 2014

Robert Dahl  
Chairman, Apostle Islands Historic Preservation Conservancy  
P.O. Box 88  
Bayfield, Wisconsin 54814

Dear Bob:

Thank you for your letter of October 15, 2014 regarding the Sand Island Campsite and Day-Use Plan (Plan). We appreciate your general comments and support concerning the preservation and interpretation of the cultural resources of Sand Island.

In regard to your specific comments, the 2002 Wayside Exhibit Plan still holds a great deal of value and we do plan to implement the exhibits it calls for. That said, it does deserve updating and we continually evaluate wayside placement to reflect that. Our plan to place three waysides at the Hansen Farm is just one example.

We understand your concerns regarding the future of the Plenty Charm cottage. In 2002, the Lakeshore submitted a draft determination of eligibility (DOE) to the Wisconsin State Historic Preservation Office for the cottage. The DOE was returned to the Lakeshore with a finding of not eligible for the national register due to a lack of architectural or historical distinction. The Lakeshore has not made a decision regarding the future of the cottage. A re-evaluation of this structure's potential historical significance is not part of the scope of this Plan and it is outside of the Area of Potential Effect (APE).

Your letter also raised a number of questions regarding the East-West Trail that we will try to address. The trail would be a primitive trail with a trail tread of approximately 2 feet and a total brushed area of approximately 6 feet in width. The length would be approximately 1.75 miles, which calculates to 1.3 acres of total disturbed area. The soil type for the majority of the route is silt loam or loam over clay with one large wetland and one beaver flowage. The beaver flowage blew out last year and was nearly dry this summer, but that will come and go depending on beaver activity. The trail would follow the old roadbed to the extent possible, but would be designed to avoid wetlands. The NPS meets the requirements of Section 404 of the Clean Water Act (administered by the Corps of Engineers and Wisconsin Department of Natural Resources) and E.O.

11990 As mentioned in the Plan (page 52), Director's Order 77-1 (NPS wetland guidelines), exempts activities that impact less than 1/10 acre of wetlands where the purpose is for "... trails or boardwalks". We expect wetland disturbance to fall below the 1/10 acre threshold. In these circumstances, consultation with the Corps of Engineers is not part of the compliance process. If the final layout of the trail indicates that it cannot be done without staying below this threshold, additional compliance would be needed. The Plan has been revised under the description of alternatives and impact analysis sections to add additional information regarding the trail.

The NPS has not evaluated the East-West roadway for National Register eligibility. Regardless, if an alternative were selected that rehabilitated the roadway as a park trail, a survey would be undertaken to determine resources present in the roadbed and potential adverse effects from trail improvement work. Many historic trails (such as Lake Superior's famed Grand Portage) have been rehabilitated and maintained as modern hiking trails. We believe that a similar adaptive reuse of this roadway would help in recognizing and interpreting its place in Sand Island history, including the story of the connections between the East Bay community and West Bay, and would result in no adverse effects.

Again, we thank you for your interest in the National Lakeshore and your input into this important planning effort.

Sincerely,



Tom Ulrich  
Acting Superintendent