



APOSTLE ISLANDS HISTORIC PRESERVATION CONSERVANCY

P.O. BOX 88. BAYFIELD. WI 54814

October 15, 2014

Ms. Julie Van Stappen
Chief
Planning and Resource Management
Apostle Island National Lakeshore
415 Washington Avenue
Bayfield, WI 54814

Dear Ms. Van Stappen:

This letter provides comments of the Apostle Islands Historic Preservation Conservancy ("AIHPC") on the Draft Sand Island Campsite and Day-Use Plan and Environmental Assessment.

The AIHPC supports adoption and implementation of the Plan. We agree that it is important to improve the public use and access to facilities in the East Bay area of Sand Island. We also thank Mr. Ulrich for his letter of September 12 responding to our September 5 Consulting Party Comments; the information provided in his letter is very helpful.

As stated in our letter of September 5, we continue to believe that increased emphasis should be placed on the exceptional historic and cultural values of Sand Island. As recognized by Congress in 2004 when it adopted the NPS preferred alternative for wilderness that excluded all of Sand Island, such a designation of this "cultural resource-dense area" has the effect of "enhance[ing] the National Park Service's ability to preserve and restore the cultural resources themselves, rather than just preserving stories." Apostle Islands National Lakeshore, *Final Wilderness Study/Environmental Impact Statement*, at 97 (March 2004). We are pleased that Acting Superintendent Ulrich recognized the rich cultural history of Sand Island in his September 12 letter, and it is exciting to learn about the potential for a Cultural Landscape Report/EA and Inventory for several of the key features of the Island that hold great historic value. We hope that NPS is able to secure funding for the work in the upcoming year. We would welcome the opportunity to provide information and assistance for the Report and Inventory.

As a general matter, we continue to urge NPS to manage Sand Island in a holistic manner, focusing on its role as an integrated and singular cultural landscape that remains connected with the community of families and people who, for more than a century, have played a major role in defining the Island's historic characteristics and values. In this regard, Sand Island, like Rocky

Island, is one of the few locations in the National Park System for which historic structures and landscapes remain tied to the community of people that shaped the history that NPS is charged with preserving. The AIHPC stands ready to assist NPS in continuing to recognize, preserve and interpret the community-based cultural heritage of Sand Island.

In addition to this general observation, we have three specific comments.

First, we are excited to learn about the Wayside Exhibit Plan. We thank you for providing the plan to us, dated from 2002, and hope that it can be implemented soon on Sand Island and elsewhere. We note that the Wayside Exhibit Plan is now 12 years-old, and predates the wilderness designation which gave increased emphasis to the historic significance of Sand Island. It therefore appears to be appropriate to revisit the Wayside Exhibit Plan to make it stronger. The AIHPC also recommends, as stated in our last letter, the development of a self-guided tour of the Hansen Farm, if not the entire East Bay area. We would be pleased to provide assistance.

Second, we remain deeply concerned by the continuing exclusion of the Plenty Charm Cottage from NPS planning documents. This building has an important place in Sand Island history, both in its own right and for its connection to Gert Wellisch, a very important person in the Island heritage. We commented on the failure of the Plan to reference the building in our September 5 letter. The subsequent Draft Plan remains silent about Plenty Charm. The Lakeshore GMP suffers from the same omission. Even though the *draft* GMP discussed Plenty Charm, and the AIHPC commented about the importance of the building in its comment letter, the final GMP deleted all reference to the building, as if it ceased to exist. The AIHPC continues to believe that Plenty Charm has an important place within the Lakeshore and that it is in need of immediate repair and stabilization. We have offered assistance in this regard. We would greatly appreciate information in the final Sand Island Plan, or some other planning document or communication, on the NPS plan for the future of Plenty Charm. If NPS has decided to abandon the building or to allow it to molder, that decision should be explained to the public and supported by an administrative record.

Finally, as stated in our September 5 letter, we believe it would be helpful to have additional information about the construction of a trail from East Bay to West Bay. We support the development of this trail, but see the need for additional environmental and cultural resource impact analyses. Developing such a trail is a significant undertaking. It will be approximately two miles in length and run along a historic roadway that has been overgrown for decades. In fact, some AIHPC members have attempted to locate and make their way along the roadway in recent years, with no success because it is so heavily vegetated. The former roadway runs through low-lying and wet areas. Figures 6 and 7 in the Draft Plan show large portions of the area through which the trail is likely to run to be within, or close to, areas that have peat soils and tamarack-conifer alkaline swamp. Thus, the potential for impacting wetland areas is very high.

The old roadway itself may qualify as an historic property under the NHPA, or at least as an historic resource within the purview of NPS cultural property preservation mandates. In addition, opening up cross-Island access to the historic West Bay Club presents the potential for impacts to that property and landscape.

In short, developing the East-West Bay Trail is a challenging project with potentially significant impacts. The Draft Plan, however, provides very little discussion of this project. As noted in our last letter, the scoping process for the Sand Island Plan did not include the trail. The fact that it is mentioned in the GMP does not satisfy the need for site-specific review at the time of project planning. The Draft Plan shows the trail as a dotted line in Figure 5, mentions the trail in the description of Alternatives C and D and their impacts, and considers it together with the other trail and campsite development in the columns for Alternative D in the Alternative Matrix and Impact Matrix. The EA states that less than 1/10-acre of wetlands would be impacted and 6 acres of vegetation impacted from *all* campsite and trail development under Alternative D (7 individual campsites, 3 group campsites, 3 trails, one day-use area). This is the sum total of discussion of the trail in the Draft Plan. Assuming a nearly two-mile long trail with a 3-foot wide tread and 1-foot clearance on either side, our rough calculation is that about 2 acres of vegetation disturbance would be required for this trail alone, leaving only 4 acres for all of the remaining Alternative D development. Depending on location, more than 1/10th-acre of wetlands could be impacted.

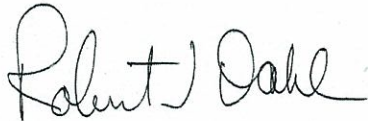
The brief treatment of this two-mile long trail in the Draft Plan/EA leaves important questions unanswered: What will the trail width be? Will it be handicapped accessible in any locations, requiring greater width? What will the surface be? How will the wetlands along the route be avoided to achieve the less than 1/10th acre impact? *See* attached map. How does the trail route in Figure 5 correspond to the soils map in Figure 6, vegetation map in Figure 7, and the attached wetlands map? Will the Corps of Engineers be consulted with? Will boardwalks be used and, if so, where? If the trail is re-routed to avoid wetlands, how far will it deviate from the historic roadway and where? How much vegetation impact will be temporary vs. permanent? Has NPS considered whether the roadway itself might be eligible for National Register listing? What is the expected level of public use? What kind of interpretation will be used in conjunction with the trail and West Bay?

We believe additional planning and impact analyses are desirable for the trail to West Bay. Some of our members are familiar with the historic roadway and would be able to provide assistance in addressing these questions and developing historical and educational information about the former location and use of the trail. Please let us know if we can be helpful in that regard.

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Thank you for considering these comments. We sincerely hope there will be sufficient funding made available to carry out these projects. Please let us know if the AIHPC may be of assistance in carrying out the Sand Island Plan.

Sincerely,

A handwritten signature in cursive script, reading "Robert J. Dahl". The signature is written in dark ink on a white background.

Robert J. Dahl
Chairman



Sand Island

 Project Area Boundary

NWI Wetlands

Image Source: Microsoft®, September 2011

0 1,250 2,500
Feet



File: NWI.mxd (GS)
October 9, 2014