



FINDING OF NO SIGNIFICANT IMPACT

Nonwilderness Cultural Resource Management Plan and Environmental Assessment

Isle Royale National Park

INTRODUCTION

In compliance with the National Environmental Policy Act of 1969 (NEPA), the regulations of the Council on Environmental Quality for implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508), (1978 regulations) and NPS Director's Order 12, *Conservation Planning, Environmental Impact Analysis, and Decision-making*, the National Park Service (NPS) prepared an environmental assessment to analyze possible alternatives and their associated environmental impacts to cultural resources in Isle Royale National Park (Park) nonwilderness areas. The Isle Royale Nonwilderness Cultural Resource Management Plan / Environmental Assessment (CRMP/EA) addresses the management, use, and treatment of historic structures, historic districts, archeological sites, and cultural landscapes in nonwilderness settings in the Park; and establishes research and documentation priorities for archeology, ethnography, and history. The CRMP/EA also includes plans for the treatment of museum collections and vernacular boats. The CRMP/EA does not address the treatment or use of historic structures and districts in wilderness or potential wilderness areas of the park. A Wilderness Stewardship Plan / Supplemental Environmental Impact Statement is underway that will address the treatment of Park historic properties in wilderness and potential wilderness. The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the CRMP/EA and its associated decision file. To the extent necessary, relevant sections of the CRMP/EA are incorporated by reference below. A non-impairment determination is included in attachment 1.

BACKGROUND

Isle Royale National Park is in the northwestern section of Lake Superior within 14 miles of the Ontario (Canada) shoreline, 20 miles east of Minnesota, and approximately 45 miles north of Michigan's Keweenaw Peninsula. There are no roads on or leading to the island. The Park includes the primary island—known as Isle Royale—and more than 400 smaller islands, which together form a complex, forested archipelago surrounded by the deep, cold waters of Lake Superior. The Park was formally authorized on March 3, 1931, and officially established on April

3, 1940. Since establishment, the Park has been managed with a focus on backcountry-based recreation in a manner that protects natural and cultural resources. In 1976, 99% of the total 133,788 land acres of the Park's surface land base were designated as wilderness or potential wilderness.

As a rich source of fish, wildlife, plants, and minerals, Isle Royale has attracted human visitors and residents for millennia. Evidence of human use, activity, and habitation can be found throughout Isle Royale and in the surrounding waters. Cultural resources ranging from lithic scatters of chipped stone to lighthouses, reveal a rich history of human use spanning from Archaic times (ca. 3000 BC) to the present day and reflect a rich, freshwater maritime history. The Park is home to hundreds of cultural sites including prehistoric and historic mining sites, shipwrecks, historic resorts and cottages, historic fisheries and boats, lighthouses and navigational aids, and more recent historic infrastructure associated with management of the Park. The Park also has a rich ethnographic and traditional use history as well as a vast and growing museum collection. These resources are key to the significance of the park and require research and documentation as well as active management in order to be preserved and shared with the public.

The CRMP/EA fulfills a planning priority for resource preservation and documentation, facility management, and interpretation. As a part of the Park's overall planning portfolio, the CRMP/EA is a step toward development of a holistic approach for managing Park resources that provides more specific direction tiering from the Park's 1998 *Final General Management Plan*.

PURPOSE AND NEED

The purpose of the CRMP/EA is to develop a long-term comprehensive strategy for managing the cultural resources in nonwilderness areas of the Park to ensure consistent and appropriate resource identification, preservation treatment, and guidance for future interpretation. A cultural resource management plan is needed to prioritize the limited time and resources available to document and maintain the wide scope and variety of the park's cultural resources. There are gaps in knowledge about cultural resources and the contextual history of the human experience at the Park. A need exists to assess and determine these knowledge gaps and the appropriate means to resolve them.

Appropriate management of historic recreational cabins and fishery complexes, lighthouses, and historic NPS infrastructure in nonwilderness settings are among the planning needs in the CRMP/EA. Expired life leases authorizing private residential use of publicly owned historic structures will not be renewed or extended and planning for the future use and preservation of these structures is needed. The National Park Service is also working closely with the US Coast Guard in anticipation of accepting ownership, management responsibility, and potential restoration of the historic Passage Island and Isle Royale light stations. The CRMP/EA prioritizes limited resources for treatments to maximize cultural resources preservation upon implementation of the CRMP/EA. There is a further need to promote use of the Park's museum collections to both enhance public knowledge, research, and understanding of the park resources within regional and national historical contexts.

There is also a need to determine appropriate visitor use, interpretation, and partnership opportunities for managing the Park's cultural resources. Resource type, location, and preservation treatment options all have implications regarding appropriate visitor use and experience, interpretation, and cooperative partnerships. Additionally, a variety of appropriate partnerships and opportunities for cooperation with local communities, government agencies, nonprofit organizations, and other entities need to be considered to assist with preservation efforts.

ALTERNATIVES CONSIDERED

The CRMP/EA considers a no-action alternative and two action alternatives. These alternatives are briefly summarized below. See chapter 2 of the CRMP/EA for the full description of each alternative and of actions common to all alternatives and common to action alternatives A and B.

Alternative A (No Action)

Alternative A represents the continuation of ongoing management of cultural resources within Isle Royale National Park. No additional actions would occur to the management of archeological resources associated with historic mining besides those common to all alternatives. Similarly, no additional changes would occur to the management of submerged archeological resources (e.g., shipwrecks), cemeteries and burial sites. For cabins in nonwilderness areas, such as the Farmer Cabins at Rock Harbor and those at Washington and Barnum Islands, the National Park Service would pursue adaptive reuse, including administrative use, Artist-in-Residence programs, and interpretive and educational programs. The Spruces Cabin, located at Rock Harbor, would continue to be preserved and maintained for administrative or interpretive use. The Edisen Fishery would continue to serve as an interpretive fishery for park visitors, and the National Park Service would continue to actively manage the site by maintaining and preserving buildings and associated features.

No additional actions would occur to the management of vernacular boats owned by the National Park Service. The exteriors of the Rock of Ages Lighthouse and Rock Harbor Lighthouse would continue to be maintained with only basic stabilization to prevent future deterioration. The National Park Service would participate in efforts led by the General Services Administration to identify a nonprofit or other government agency (potentially including the National Park Service) to accept ownership of two other lighthouses under provisions of the National Historic Lighthouse Preservation Act. No additional actions would occur to the management of Civilian Conservation Corps, Mission 66, and other NPS infrastructure of these resources. The Park would continue to engage in consultation with traditionally-associated tribes and traditionally-associated Scandinavian fishers to identify important sites and resources, document ethnographic resource and landscape studies, and guide ethnographic resource management.

Alternative B (Selected Alternative)

Alternative B seeks to preserve and provide proactive stewardship of the full range of cultural resources at the Park and ensure appropriate management of fundamental resources and values.

The alternative emphasizes a vibrant partnership program—particularly for actions associated with historic structures. If partnerships cannot be identified, actions could be delayed, and in the interim, the National Park Service would provide basic stabilization and maintenance for historic buildings. The Park would work with American Indian tribes to enhance or revive their long relationship with Isle Royale. Partnerships with members of former commercial fishing permit and life lessee families who have helped to maintain historic buildings and structures are anticipated.

Key elements of alternative B are:

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

Research efforts would focus on known information gaps in the Park's archeological record. For precontact settings, which are emphasized in the Park's enabling legislation, increased archeological inventories would be performed within the Park's interior, along relict shorelines, and in areas where private use agreements have precluded adequate study in the past. Under alternative B, there would also be an increased emphasis for shipwreck documentation, monitoring, and interpretation.

The Park would increase efforts to document and understand Ojibwe culture and would further document the use and importance of Ojibwe fishing and lifeways at Isle Royale. The 2016 scope of collections statement may be revised to reflect changing Park collection priorities, including preserving significant items related to all cultural resource categories represented at the Park.

The resort and recreational structures and landscapes at Barnum Island would be rehabilitated. These rehabilitations could include converting six cabins to interpretive exhibit space,

workshops, overnight lodging for educational program participants, a storm shelter, and housing for caretakers, educational program staff, or maintenance crews. The historic Johns Hotel and Johns Cabin would be restored and used for interpretive exhibits. The historic Barnum dock and boathouse dock would be stabilized and interpreted. Non-historic temporary docks would be removed. A permanent and accessible dock could be constructed near the east end of Barnum Island and may incorporate a reconstructed boat house (once present) to facilitate interpretive exhibits.

The Rock Harbor Lodge Guesthouse in Rock Harbor would change from administrative use to public use and would be restored to its historic function as a public lodging facility. Assessment fishery permits would be sought from the State of Michigan. Assessment fisheries could operate from Washington Island and the Edisen Fishery and with a scientific assessment, recreational, and/or cultural emphasis. The fishing operation under an assessment permit would serve as a demonstration fishery to interpret the new fishing operation and activities associated with the fisheries that historically operated in the Park to the public. A historic wooden boat or a reproduction of a historic boat could be used for boat tours and possibly rentals. The restored and seaworthy *Tern* would be put on display and interpreted at Edisen Fishery.

Alternative C

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

Key elements of alternative C are:

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

BEST MANAGEMENT PRACTICES AND MITIGATION MEASURES

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

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

SIGNIFICANCE CRITERIA REVIEW

The intensity or severity of impacts resulting from implementing the selected alternative is evaluated using the ten criteria listed in 40 CFR 1508.27. Key areas in which impacts were evaluated include archeological resources, historic structures and associated historic districts and cultural landscapes, ethnographic resources, and visitor use and experience. As defined in 40 CFR 1508.27, significance is determined by examining the ten following criteria.

1. Impacts that may be both beneficial and adverse; a significant effect may exist even if the National Park Service believes that, on balance, the effect will be beneficial

Under the selected alternative, expanded archeological research to address information data gaps and archeological inventories of previously unsurveyed areas will have long-term beneficial impacts on the Park's archeological resources by increasing understanding of the island's former inhabitants and the nature of past activities. Similar beneficial impacts are expected from increased understanding of prehistoric and historic mining associated with expanded monitoring and research. Some adverse impacts could occur from natural erosion, visitor use, ongoing maintenance operations, new infrastructure development, and other factors. These impacts will not be significant because the National Park Service will use the best management practices described in appendix A of the CRMP/EA and the mitigation measures presented above.

Adaptive use of selected historic buildings will be carried out in conformance with the *Secretary of Interior's Standards* and with additional technical guidance provided by cultural landscape reports and historical structures reports to avoid adverse impacts. Rehabilitation of resort and recreational structures and landscapes at Barnum Island and fishery resources at Washington

Island will contribute long-term benefits to the preservation of key historic structures and the historic setting of the sites. Ongoing adaptive reuse of buildings will assist with their preservation and structural integrity and will protect historic building fabric and character-defining features of the associated cultural landscapes. Restoration of the historic Johns Hotel and Johns Cabin in accordance with a historic structures report and other plans will protect their historic character and ensure their continued relevance and appropriate use. Preservation and enhanced interpretation proposed for the Edisen Fishery will have long-term benefits on the historic buildings of the site. These treatment efforts, likely undertaken with partners, will ensure historic structure preservation is undertaken in a fashion that perpetuates their historic significance and continued use.

At Rock Harbor and Barnum Island, the potential for the addition of new or relocated structures into the historic landscapes for interpretation or to meet visitor or administrative needs could have adverse effects on historic landscapes. Similarly, the addition of new buildings within or adjacent to a potentially historic landscape associated with Mission 66 architecture at Rock Harbor, or among the historic resort landscape at Barnum Island, could adversely affect the historic character of either location. These impacts will not be significant, as adherence to guidelines established by cultural landscape treatment recommendations will reduce or eliminate them.

Other actions are not expected to have adverse impacts, as their objective is to better preserve and highlight resources. Some of these activities include the restoration and preservation of historic vernacular fishing boats, preservation treatments for lighthouses, increased documentation and research of Ojibwe culture and lifeways, and increased visitor access to the diversity of historic and cultural resources at the Park.

2. The degree to which the proposed action affects public health or safety

The only expected public health and safety concerns are related to construction activities. During construction of proposed new facilities and rehabilitation / restoration of historic structures and cultural landscape features, areas of construction will be clearly marked. Temporary closures would be used to keep the public away from areas where potentially harmful construction activities occur. Because the public will not be exposed to construction activities, the adverse effects from the proposed construction activities will not be significant. All new construction and preservation and rehabilitation of historic buildings and structures will be carried out in a fashion that ensures that the health and safety of Park visitors and staff are protected.

3. Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas

As described in the CRMP/EA, the selected alternative will not affect wetlands, wild and scenic rivers, prime farmlands, or ecologically critical areas as those resources do not exist in the project area. While archeological sites exist throughout the Park, no known sites are identified as at risk of significant impacts by proposed project actions. If previously undiscovered archeological resources are uncovered during construction, all work in the immediate vicinity of the discovery will be halted until the resources are identified and documented and an

appropriate mitigation strategy is developed in consultation with the state historic preservation office and in accordance with Director's Order 28A: *Archeology*, the National Historic Preservation Act, the Archaeological Resources Protection Act, and other applicable regulations.

4. The degree to which effects on the quality of the human environment are likely to be highly controversial

Largely beneficial impacts on the quality of the human environment are anticipated from actions proposed under the selected alternative, particularly associated with enhanced visitor access and opportunities to experience and connect with the Park's important resources and values. Limited short-term, adverse effects may occur associated with typical construction disturbances (e.g., increased noise, visual intrusion of construction equipment on historic settings, access disruptions), but these disturbances are not anticipated to affect the quality of the human environment over the long term. None of the actions are unusual; none of the impacts are controversial in terms of impacts to the environment.

5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks

The activities under the selected alternative will not result in highly uncertain effects or involve unique or unknown risks. As presented in the CRMP/EA and associated consultations under Section 7 of the Endangered Species Act (ESA; 87 Stat. 884, as amended: 16 *United States Code* [USC] 1531 et seq.), and Section 106 of the National Historic Preservation Act, as amended (54 USC 306108), and its implementing regulations (36 CFR 800), the potential impacts of the selected action on the human environment are well understood and are not significant. Furthermore, public input (as described below) did not identify any new or uncertain risks associated with the action. Therefore, the degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks will not be significant.

6. The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration

The selected alternative will not establish a precedent for future actions with significant effects, nor does it represent a decision in principle about a future consideration. No significant effects have been identified from the actions in this plan, and all future actions will be analyzed for potential impacts.

7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts

None of the adverse impacts under the selected action are significant. Additionally, as described under criteria 1 and 3 above, mitigation measures and best management practices will further reduce impacts on cultural resources and visitor use and experience and ensure there is no potential for significant impacts. Finally, when added to other past, present, and reasonably foreseeable future actions at the Park, as evaluated in the CRMP/EA, the incremental impact of selected action will not result in a significant cumulative effect.

8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources

The Park has more than 250 designated archeological sites represented by precontact and historic copper mining pits, Native/European contact and trade sites, historic mining camps, precontact fishery and habitation sites, historic fisheries, shipwrecks, cemeteries, and lighthouse sites. The earliest American Indian occupants mined for copper and carried out other subsistence activities on the island. At least 30 of these known sites are associated with Archaic period cultures (between approximately BC 2500 and 1000). Initial (between BC 1000 and AD 700) and Terminal (between AD 600 – 1650) Woodland cultures are associated with many more sites. Much of the island's interior, including its relict shorelines, has not been surveyed; thus, there exists a strong potential for further archeological discovery. The findings of recent archeological surveys along these relict shorelines suggest that a great deal of early island prehistory remains undefined.

The Minong Mine Copper Mining District was recently designated as a National Historic Landmark and is known for its extensive inventory of precontact and historic mining features. Archeological remains of the island's shipwrecks are comprised of a variety of designs including large steam ships such as ore boats or passenger-freighters, as well as smaller vessels, including tugs, barges, and fishing skiffs. Ten of the larger wrecks have been formally documented and listed on the national register.

The Park contains more than 190 structures that are more than 50 years old, approximately half of which are outside of wilderness, thus subject to the actions of the selected alternative. Most are either listed or have been determined eligible for listing on the National Register of Historic Places. These structures are from the various historic eras of island use and development. Some, such as lighthouses and fishery sites, are representative of the island's maritime heritage.

In all situations, actions under the selected alternative associated with historic structures and their associated landscapes (all in nonwilderness) will adhere to rehabilitation and restoration treatments in conformance with approved standards and guidelines identified in the *Secretary of the Interior's Standards for the Treatment of Historic Properties*, and the *Guidelines for the Treatment of Cultural Landscapes* and the Programmatic Agreement among the National Park Service and the Michigan State Historic Preservation Office regarding the CRMP. The selected alternative also establishes that all nonwilderness rehabilitation and restoration projects, as well as development plans for improved visitor services in nonwilderness, will be guided by appropriate treatment documents including cultural landscape and historic structure reports. These measures will result in beneficial impacts on historic properties that will preserve distinctive architectural elements of historic buildings and character-defining features of the cultural landscape (e.g., spatial relationships, patterns of circulation, historic views and vistas).

9. The degree to which the action may adversely affect an endangered or threatened species or its critical habitat

The National Park Service determined that no federally listed threatened and endangered species will be adversely affected with implementation of the selected alternative. During the preparation of the CRMP/EA, NPS staff informally consulted with the US Fish and Wildlife

Service East Lansing Michigan Field Office. The NPS contacted the field office in a letter dated October 1, 2014 to advise that Isle Royale National Park was undertaking the development of a CRMP/EA and initiated informal consultation. While the endangered gray wolf was relisted (effective December 19, 2014) and delisted (effective October 29, 2020), and the northern long-eared bat status changed from a proposed threatened species to a formally listed threatened species (effective April 2, 2015), the selected alternative is not anticipated to have an adverse impact on federally listed and candidate species. Formal Section 7 consultation is described below in Public and Agency Involvement.

No action in the selected alternative will alter terrestrial wildlife populations or habitats in the Park. There is no anticipated habitat fragmentation; habituation of wildlife to people; or changes in population numbers, distributions, or reproduction that will affect the viability of a population or its habitat in the Park. Although endangered peregrine falcons nest in the cliffs on Passage Island, maintenance and other proposed treatment actions will occur when the peregrines are not nesting to minimize disturbance. No endangered gray wolf or northern long-eared bat habitats exist in the proposed project areas.

Although some individual native plants could be lost at specific sites because of actions in the selected alternative, no appreciable changes are expected to occur to the Park's vegetation communities, and no endangered or threatened species will be impacted. Likewise, no changes in population numbers, distributions, or reproduction will be expected that will result in the loss of a species or a noticeable reduction of a plant population in the Park because of actions under the selected alternative. Likewise, no expected loss of plants having particular cultural importance for the Park's associated American Indian tribes (the Grand Portage Band of the Ojibwe) are expected from actions under the selected alternative. Isle Royale's shorelines harbor many of the Park's rare and threatened and endangered plant species and are very sensitive to disturbance. The selected alternative directs historic preservation work and archeological surveys, some of which will occur along shorelines where most of the Park's rare plant species occur. Biological surveys will be conducted before such work, and sensitive areas will be flagged to ensure that sensitive habitats are avoided during any archeological or preservation work.

10. Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment

The selected alternative will not violate any federal, state, or local laws or requirements imposed for the protection of the environment.

PUBLIC AND AGENCY INVOLVEMENT

The CRMP/EA was available for public review and comment on the Park website and the NPS Planning, Environment, and Public Comment (PEPC) website (<http://parkplanning.nps.gov/isro>) during a 30-day period beginning August 6, 2019. A hard copy of the document was distributed to various stakeholders and was also available at the Park visitor centers in Houghton, Michigan, and on the island at Windigo and Rock Harbor. The Park received many comments supporting the plan and preferred alternative and several

substantive comments during the public review period, the responses to which have been included in attachment 2.

Compliance with section 106 of the National Historic Preservation Act was carried out separately but concurrently with the NEPA planning process for the CRMP/EA. The Section 106 consultation process was carried out in two processes, one with the Lake Superior Chippewa Tribes of Red Cliff, Bad River, Lac Courte Oreilles, Lac du Flambeau, Keweenaw Bay, Lac Vieux Desert, Fond du Lac, Grand Portage, Milles Lacs, Bois Forte, Bay Mills, and Sault Ste. Marie; and the other with non-tribal consultants, including the Michigan State Historic Preservation Office, the Advisory Council on Historic Preservation, the Isle Royale Families and Friends Association, the National Trust for Historic Preservation, the North Shore Commercial Fishing Museum, the Michigan Historic Preservation Network, the Sierra Club, and Wilderness Watch. Detailed description of the Section 106 Consultation process can be found in chapter 4 of the CRMP/EA on pages 67-69.

During most of the Section 106 consultation, the cultural resource management plan was devised as an Environmental Impact Statement (EIS) with consultation discussions carried out concurrently with efforts on the Park's Wilderness Stewardship Plan / Supplemental EIS, which is still in development. Throughout the process, the consultation focus was primarily on the identification and treatment of historic structures and associated districts and landscapes in wilderness and potential wilderness areas of the Park. The NPS determined that the evaluation of the alternatives for actions associated with historic structures in proposed and designated wilderness will occur exclusively in the Wilderness Stewardship Plan / Supplemental EIS, for which consultation with stakeholders continues. Historic structures in wilderness are therefore not addressed in the CRMP/EA. The National Park Service has determined that the actions identified in the selected alternative of the CRMP/EA have no potential for significant impacts under the National Environmental Policy Act but may have an adverse effect to historic properties under Section 106 of the National Historic Preservation Act. The NPS finalized a programmatic agreement (PA) to mitigate potential adverse effects on historic structures and cultural landscapes on Barnum and Washington Islands, and those associated with the Rock Harbor development, which are listed in or eligible for listing in the National Register of Historic Places. The programmatic agreement was signed by all required parties on 12/06/2022.

Some activities proposed in the CRMP/EA could require additional consultation before they are carried out, including specific archeological investigations, repair and rehabilitation of historic structures, and the installation of visitor services and infrastructure within historic landscapes. Future Section 106 compliance efforts would be guided by the processes laid out in the 2022 Programmatic Agreement for the CRMP, 2008 Programmatic Agreement among the National Park Service (US Department of the Interior), the Advisory Council on Historic Preservation, and the National Council of State Historic Preservation Officers for Compliance with Section 106 of the National Historic Preservation Act.

Compliance with Section 7 of the Endangered Species Act was carried out via consultation with the US Fish and Wildlife Service (USFWS). During the preparation of this CRMP/EA, NPS staff informally consulted with the USFWS East Lansing Michigan Field Office. The National Park

Service contacted the field office in a letter dated October 1, 2014 to advise that Isle Royale National Park was undertaking the development of a cultural resources management plan and to initiate informal consultation. The letter included a list of species listed or proposed for listing in Keweenaw County, Michigan, which includes Isle Royale National Park, as of August 5, 2014, and requested concurrence on this list. The US Fish and Wildlife Service responded on November 25, 2014 and agreed with the list of species that inhabit, or may inhabit, the Park.

NPS staff subsequently checked the US Fish and Wildlife Service's Environmental Conservation Online System Information for Planning and Conservation to ensure the species list had not changed. Since that time, the endangered gray wolf was relisted, effective December 19, 2014, and the northern long-eared bat status changed from a proposed threatened species to a formally listed threatened species, effective April 2, 2015. The US Fish and Wildlife Service provided an updated list of threatened and endangered species that may occur in the proposed project location and/or may be affected by the project, dated July 23, 2015. For reasons discussed in the CRMP/EA (pages 15 and 16), the National Park Service determined that there would be no adverse impact to threatened and endangered species, regardless of the selected alternative. The US Fish and Wildlife Service was provided a copy of the CRMP/EA with this assessment documented.

FINDING OF NO SIGNIFICANT IMPACT

Based on the review of the facts and analysis contained in the environmental assessment and described above, the National Park Service has selected alternative B to implement the Nonwilderness Cultural Resources Management Plan / Environment Assessment at Isle Royale National Park. The selected alternative will not have a significant impact either by itself or in consideration of cumulative impacts. Accordingly, the requirements of the National Environmental Policy Act, regulations promulgated by the Council on Environmental Quality, regulations promulgated by the Department of the Interior, and provisions of Director's Order 12 and the 2015 *National Park Service NEPA Handbook* have been fulfilled.

It is my determination that the selected alternative does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, in accordance with NEPA and Council on Environmental Quality (CEQ) regulations (40 CFR 1508 et. seq.), an environmental impact statement is not required and will not be prepared for implementation of the selected alternative.

Recommended:

Denice Swanke, Superintendent
Isle Royale National Park

Date

Approved:

Herbert C. Frost, Ph.D.
Regional Director

Date

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ATTACHMENT 1: NON-IMPAIRMENT DETERMINATION

The NPS *Management Policies* (2006) require analysis of potential effects to determine whether actions would impair Park resources. The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the 1916 General Authorities Act, as amended, begins with a mandate to conserve park resources and values. NPS managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adversely impacting park resources and values.

However, the laws do give NPS managers discretion to allow adverse impacts on park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given the National Park Service the management discretion to allow certain impacts within parks, that discretion is limited by statutory requirement that the National Park Service must leave park resources and values unimpaired, unless a particular law directly and specially provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources and values. To determine impairment, the National Park Service must evaluate “the particular resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts” (NPS 2006b).

This determination on impairment has been prepared for the NPS selected alternative described in the Finding of No Significant Impact. An impairment determination is made for all resource impact topics analyzed for the selected alternative. An impairment determination is not made for visitor use and experience because impairment findings relate back to park resources and values, and this impact topic is not generally considered to be a park resource or value according to the Organic Act and cannot be impaired in the same way that an action can impair park resources and values.

ARCHEOLOGICAL RESOURCES

There is a small or limited possibility that archeological resources may be impacted by ground disturbance associated with new construction and rehabilitation of a cultural landscape. Actions associated with the selected alternative that may impact archeological resources include the development of interpretive walking trails, the installation of picnic and pit toilet facilities, possible future infill of new or relocated structures at Rock Harbor or Barnum Island, the removal of existing docks and construction of new docks on Barnum Island, and rehabilitation of cultural landscape features. Archeological surveys, testing and monitoring (as necessary) would be carried out in all project areas that involve ground disturbance to ensure that significant resources that may exist in these areas are identified and avoided or adequately mitigated. Limited adverse impacts on archeological resources could result from continued and increased visitor use in areas with potentially sensitive archeological resources, natural erosion, maintenance operations, and other factors, but these impacts would also be minimized through

visitor education and continued monitoring. Only minimal impacts on archeological resources are anticipated as a result of efforts to identify and avoid potential sites. In summary, none of the actions would permanently destroy archeological sites integral to the park. Mitigation, including surveys and monitoring, would ensure long-term protection of sites; therefore, there will be no impairment of archeological resources as a result of the selected alternative.

HISTORIC STRUCTURES AND ASSOCIATED CULTURAL LANDSCAPES

Rehabilitation and adaptive reuse of historic structures through partnerships would provide long-term, beneficial impacts to historic structures as described in the plan. Adaptive use of selected buildings for occupancy and educational support will be carried out in conformance with the *Secretary of Interior's Standards for the Treatment of Historic Properties* as part of individual agreements between the NPS, preservation partners, and the state historic preservation officer. Additional technical guidance for rehabilitation efforts will be provided by cultural landscape and historic structures reports. The *Secretary of Interior Standards* are intended to be used to minimize, mitigate or avoid adverse impacts to historic resources, including historic structures. Because the selected alternative follows these standards and provides preservation of historic structures in nonwilderness, Isle Royale's historic structures will not be impaired under the selected alternative.

Impacts to cultural landscapes associated with the selected alternative include modern improvements to cultural landscapes and the potential for new development/infill at Barnum Island and Rock Harbor. The potential addition of new or relocated structures into historic landscapes for interpretation or to meet visitor or administrative needs could negatively impact broad historic landscapes by introducing buildings not part of the original landscape. However, adherence to guidelines established by cultural landscape treatment recommendations would likely reduce or eliminate such impacts. Development of interpretive walking trails, a picnic area, and an accessible dock at Washington and Barnum Islands could result in adverse impacts to the historic landscapes design by introducing modern elements to a historic setting. However, these projects will be carried out in accordance with the *Secretary of Interior Standards* in a manner that minimizes impacts to the historic character of the cultural landscape. In summary, the actions in the selected alternative may result in slight changes to cultural landscapes in Isle Royale's nonwilderness areas. These changes, however, will not impact the integrity of the landscape, which will continue to be maintained to the highest degree possible while continuing to serve the needs of park visitors. Because any changes to the cultural landscape will follow treatment recommendations and be minimized through mitigation measures, actions within the selected alternative will not impair cultural landscapes in nonwilderness areas.

ETHNOGRAPHIC RESOURCES

Ethnographic resources have significance to native peoples or historic island communities and include precontact and historic sites, structures, landscapes, fauna, and objects and natural resources such as rivers, watersheds, and plant and animal species. Past adverse impacts on ethnographic resources have resulted from development, visitor use, and other factors. The impacts associated with implementation of the selected alternative would be beneficial to ethnographic resources through enhanced efforts to identify, document, and preserve places

and resources of enduring cultural value to the Ojibwe and to the descendants of Scandinavian fishermen and island dwellers. The impacts to ethnographic resources associated with the selected alternative represent an overall improvement to the resource; therefore, there will be no impairment of ethnographic resources.

Other Resources

As was documented in the environmental assessment on pages 13 through 17, the selected action was found to have negligible or no impacts on other resources, including wilderness character; museum collections; soils; vegetation; shoreline habitat; wildlife; federal and state listed and threatened or endangered species; traditional native plants; treaties, tribal rights, and sacred sites; the socioeconomic environment; environmental justice; and Indian trust resources. These resources will remain similar to current conditions and will be available to be enjoyed by current and future generations. Therefore, they will not be impaired by implementation of the selected alternative.

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ATTACHMENT 2: ERRATA

This Errata consists of two parts. Part 1 contains corrections and minor revisions to the environmental assessment shown as underlined or ~~striketrough~~ text. Referenced page numbers pertain to the August 2019 Non-wilderness Cultural Resources Management Plan / EA (CRMP/EA). The edits and text corrections described in Part 1 do not result in any substantive modifications to the selected alternative, and it has been determined that the revisions do not require additional environmental analysis. Part 2 provides NPS responses to comments and requests for edits that were received on the CRMP/EA.

Part 1 – Corrections and Revisions to the Environmental Assessment

1. On page 3 of the CRMP/EA, the third paragraph, second and third sentences, are amended to read: While the Ojibwe continued to fish into the 20th century, Isle Royale, with its many islands and sheltered inlets, also attracted Scandinavian immigrants from Sweden, Norway, and Finland who applied folk fishing traditions, developed scores of fisheries around the island, and supplied a commercial fishing industry. These fishing families began arriving in the early to mid-1800s and no less than 100 were based on the island at the peak of the industry in the early 1900s.
2. On page 23 of the CRMP/EA, the final sentence is amended to read: Museum collections currently in storage would be moved from the island and the Houghton storage facility to the new facility in Calumet, Michigan, when it is completed. As materials currently housed within historic properties on the island are accessioned into the park's collections, they could be moved to the new facility or exhibited in place in structures that meet museum storage guidelines and where their continued preservation can be expected.
3. On page 28 of the CRMP/EA, the first bullet of the second column in the text box is revised to read: Restoration and interpretation of the *Tern* and stabilization of the Belle vernacular boats.
4. On Page 29 of the CRMP/EA, a portion of the final paragraph is revised to read: These rehabilitations could include converting six cabins to interpretive exhibit space, workshops, overnight lodging for educational program and culture camp participants, a storm shelter, and housing for caretakers, educational program staff, or maintenance crews. The rehabilitated structures could then be used by the park to support ~~day-use~~ educational opportunities focused on sailing or traditional boatbuilding, and native youth programs ~~programing~~.
5. On Page 33 of the CRMP/EA, the following sentence is added to the end of the first paragraph: This program would include careful consideration of the condition and provenience of materials prior to acquisition to ensure objects have interpretative and scientific value and fall within the park's scope of collections.
6. On page 35 of the CRMP/EA, the first line under “Vernacular Boats” is amended to read: the *Tern* and *Belle*, located at Edisen Fishery, would be preserved and maintained to

augment interpretation of vernacular cultural traditions at Edisen Fishery. The *Belle* would not be relocated to the water or operated.

7. On page 44 of the CRMP/EA, the third paragraph, second sentence is amended to read: There are no associated outbuildings on its rocky island, the light was historically supported via a cabin that once stood on Booth Island.
8. On pages 5-6, Figure 1 and Figure 2 show the locations and resources located in non-wilderness for which planning is addressed in the non-wilderness CRMP/EA. These Figures also show those locations and resources located in designated or potential wilderness whose management is not being addressed in the CRMP/EA. Planning for the management of cultural resources located in wilderness and potential wilderness areas of the park will be addressed in a forthcoming Wilderness Stewardship Plan. References to cultural resources in wilderness or potential wilderness in the CRMP/EA are intended to provide historic context. For clarity, an additional appendix, Appendix H, has been created below, with Table 1 referencing more specifically than Figures 1 and 2, what cultural resources are within non-wilderness. Table 2 references cultural resources in wilderness or potential wilderness. Tables 1 and 2 each include a column indicating where the specific resources are mentioned in the CRMP/EA. The following two tables comprise Appendix H, which would begin on page A-24 of the CRMP/EA, and figure captions on pages 5 and 6 are amended to provide reference to Appendix H.

Appendix H – Historic properties referenced in the CRMP/EA

Table 1: Historic Properties Located in Non-Wilderness. Management planning for these resources is addressed in the Non-Wilderness Cultural Resource Management Plan / Environmental Assessment.

Historic Structure	Wilderness Designation	Resource Category	NRHP Status	CRMP Page
ALGOMA shipwreck	Non-Wilderness	Shipwrecks	NR Listed	21, 29, 51, 52, 53, 64
AMERICA shipwreck	Non-Wilderness	Shipwrecks	NR Listed	21, 29, 51, 52, 53, 64
CHESTER A. CONGDON shipwreck	Non-Wilderness	Shipwrecks	NR Listed	21, 29, 51, 52, 53, 64
CUMBERLAND shipwreck	Non-Wilderness	Shipwrecks	NR Listed	21, 29, 51, 52, 53, 64
EMPEROR shipwreck	Non-Wilderness	Shipwrecks	NR Listed	21, 29, 51, 52, 53, 64
GEORGE M. COX shipwreck	Non-Wilderness	Shipwrecks	NR Listed	21, 29, 51, 52, 53, 64
GLENLYON shipwreck	Non-Wilderness	Shipwrecks	NR Listed	21, 29, 51, 52, 53, 64
HENRY CHISHOLM shipwreck	Non-Wilderness	Shipwrecks	NR Listed	21, 29, 51, 52, 53, 64
KAMLOOPS shipwreck	Non-Wilderness	Shipwrecks	NR Listed	21, 29, 51, 52, 53, 64
MONARCH shipwreck	Non-Wilderness	Shipwrecks	NR Listed	21, 29, 32, 51, 52, 53, 64

Historic Structure	Wilderness Designation	Resource Category	NRHP Status	CRMP Page
Blake Point Light	Non-Wilderness	Lighthouses and Navigational Aids	Not Yet Evaluated	10, 11, 25, 32, 43, 56
Isle Royale Lighthouse/ Menagerie Island Light Station	Non-Wilderness	Lighthouses and Navigational Aids	NR Listed – CLI Documented – Isle Royale Light Station & Landscape	3, 10, 11, 25, 27, 32, 40, 43, 44, 51, 56, 58, 64
Menagerie Island Light Station Privy	Non-Wilderness	Lighthouses and Navigational Aids	NR Listed – CLI Documented – Isle Royale Light Station & Landscape	44
Menagerie Island Light Station Oil Building	Non-Wilderness	Lighthouses and Navigational Aids	NR Listed – CLI Documented – Isle Royale Light Station & Landscape	44
Menagerie Island Light Station Acetylene Vault	Non-Wilderness	Lighthouses and Navigational Aids	NR Listed – CLI Documented – Isle Royale Light Station & Landscape	44
Menagerie Island Light Station Outbuilding	Non-Wilderness	Lighthouses and Navigational Aids	NR Listed – CLI Documented – Isle Royale Light Station & Landscape	44
Menagerie Island Light Station Foundation Ruin	Non-Wilderness	Lighthouses and Navigational Aids	NR Listed – CLI Documented – Isle Royale Light Station & Landscape	44
Menagerie Island Light Station Walkways	Non-Wilderness	Lighthouses and Navigational Aids	NR Listed – CLI Documented – Isle Royale Light Station	44
Passage Island Lighthouse	Non-Wilderness	Lighthouses and Navigational Aids	NR Listed – Transfer Pending – Passage Island Lighthouse & Landscape	3, 10, 11, 25, 27, 32, 35, 40, 43, 44, 48, 51, 56, 58, 59, 63
Rock of Ages Light Tower	Non-Wilderness	Lighthouses and Navigational Aids	NR Listed – Rock of Ages Tower & Landscape	3, 10, 11, 25, 32, 35, 40, 43, 44, 51, 56, 58, 59
Rock Harbor Lighthouse	Non-Wilderness	Lighthouses and Navigational Aids	NR Listed – CLI Documented – Edison Fishery/ Rock Harbor Lighthouse & Landscape	3, 10, 11, 23, 25, 32, 40, 43, 48, 51, 56, 58, 63, 64

Historic Structure	Wilderness Designation	Resource Category	NRHP Status	CRMP Page
Edisen Fishery Residence	Non-Wilderness	Folk and Commercial Fisheries	NR Listed – CLI Documented – Edisen Fishery/Rock Harbor Lighthouse & Landscape	25, 30, 31, 32, 40, 43, 48, 50, 55, 58, 59, 63
Edisen Fishery Privy	Non-Wilderness	Folk and Commercial Fisheries	NR Listed – CLI Documented – Edisen Fishery/ Rock Harbor Lighthouse & Landscape	25, 30, 31, 32, 40, 43, 50, 55, 58, 59, 63
Edisen Fishery Honeymoon Cottage	Non-Wilderness	Folk and Commercial Fisheries	NR Listed – CLI Documented – Edisen Fishery/ Rock Harbor Lighthouse & Landscape	25, 30, 31, 32, 40, 43, 50, 55, 58, 59, 63
Edisen Fishery Log Sleeping Cabin	Non-Wilderness	Folk and Commercial Fisheries	NR Listed – CLI Documented – Edisen Fishery/ Rock Harbor Lighthouse & Landscape	25, 30, 31, 32, 40, 43, 50, 55, 58, 59, 63
Edisen Fishery Fish House	Non-Wilderness	Folk and Commercial Fisheries	NR Listed – CLI Documented – Edisen Fishery/ Rock Harbor Lighthouse & Landscape	25, 30, 31, 32, 40, 43, 48, 50, 55, 58, 59, 63
Edisen Fishery Net House	Non-Wilderness	Folk and Commercial Fisheries	NR Listed – CLI Documented – Edisen Fishery/ Rock Harbor Lighthouse & Landscape	25, 30, 31, 32, 40, 43, 50, 55, 58, 59, 63
Edisen Fishery Chicken Coop	Non-Wilderness	Folk and Commercial Fisheries	NR Listed – CLI Documented – Edisen Fishery/ Rock Harbor Lighthouse & Landscape	25, 30, 31, 32, 40, 43, 50, 55, 58, 59, 63
Edisen Fishery Fishing Boat, The <i>Belle</i>	Non-Wilderness	Folk and Commercial Fisheries	NR listed – as part of Edisen Fishery	25, 30, 31, 32, 35, 43, 50, 55, 58, 59, 63, 66
Washington Island Carl Ekmark Net House	Non-Wilderness	Folk and Commercial Fisheries	Determined Eligible – Washington Island & Landscape	24, 27, 30, 31, 35, 42, 43, 50, 55, 58, 60, 64, 65
Washington Island Sivertson Residence	Non-Wilderness	Folk and Commercial Fisheries	Determined Eligible – Washington Island & Landscape	24, 27, 30, 31, 35, 42, 43, 50, 55, 58, 59, 60, 64, 65

Historic Structure	Wilderness Designation	Resource Category	NRHP Status	CRMP Page
Washington Island Sivertson Privy	Non-Wilderness	Folk and Commercial Fisheries	Determined Eligible – Washington Island & Landscape	24, 27, 30, 31, 35, 42, 43, 50, 55, 58, 59, 60, 64, 65
Washington Island Caretaker's Cottage	Non-Wilderness	Folk and Commercial Fisheries	Determined Eligible – Washington Island & Landscape	24, 27, 30, 31, 35, 42, 43, 50, 55, 58, 59, 60, 64, 65
Washington Island Sivertson Laundry	Non-Wilderness	Folk and Commercial Fisheries	Determined Eligible – Washington Island & Landscape	24, 27, 30, 31, 35, 42, 43, 50, 55, 58, 59, 60, 64, 65
Washington Island Carl Ekmark Fish House	Non-Wilderness	Folk and Commercial Fisheries	Determined Eligible – Washington Island & Landscape	24, 27, 30, 31, 35, 42, 43, 50, 55, 58, 59, 60, 64, 65
Washington Island Sivertson Fish House	Non-Wilderness	Folk and Commercial Fisheries	Determined Eligible – Washington Island & Landscape	24, 27, 30, 31, 35, 42, 43, 50, 55, 58, 59, 60, 64, 65
Washington Island Sivertson Net House	Non-Wilderness	Folk and Commercial Fisheries	Determined Eligible – Washington Island & Landscape	24, 27, 30, 31, 35, 42, 43, 50, 55, 58, 59, 60, 64, 65
Washington Island Honeymoon Cottage	Non-Wilderness	Folk and Commercial Fisheries	Determined Eligible – Washington Island & Landscape	21, 24, 27, 30, 31, 35, 42, 43, 50, 55, 58, 59, 60, 64, 65
Washington Island Cabin "A"	Non-Wilderness	Folk and Commercial Fisheries	Determined Eligible – Washington Island & Landscape	24, 27, 30, 35, 42, 43, 50, 55, 58, 59, 60, 64, 65
Washington Island Wireless Radio Antenna	Non-Wilderness	Folk and Commercial Fisheries	Determined Eligible – Washington Island & Landscape	24, 27, 30, 35, 42, 43, 50, 55, 58, 59, 60, 64
Barnum Island Johns Hotel	Non-Wilderness	Recreational Resorts and Cottages	NR Listed – CLI Documented – Barnum Island & Landscape	9, 21, 24, 26, 29, 30, 35, 40, 41, 42, 53, 57, 58, 59, 60, 64

Historic Structure	Wilderness Designation	Resource Category	NRHP Status	CRMP Page
Barnum Island Johns Double Privy	Non-Wilderness	Recreational Resorts and Cottages	Determined Eligible – Barnum Island & Landscape	24, 26, 29, 35, 41, 42, 53, 57, 58, 59, 60, 64
Barnum Island Johns Log Cabin	Non-Wilderness	Recreational Resorts and Cottages	Determined Eligible – Barnum Island & Landscape	21, 24, 26, 29, 30, 35, 41, 42, 53, 57, 58, 59, 60, 64
Barnum Island George Barnum Cottage	Non-Wilderness	Recreational Resorts and Cottages	Determined Eligible – Barnum Island & Landscape	21, 24, 26, 29, 30, 35, 41, 42, 53, 57, 58, 59, 60, 64
Barnum Island Barnum Privy	Non-Wilderness	Recreational Resorts and Cottages	Determined Eligible – Barnum Island & Landscape	24, 26, 29, 35, 41, 42, 53, 57, 58, 59, 60, 64
Barnum Island Barnum Woodshed	Non-Wilderness	Recreational Resorts and Cottages	Determined Eligible – Barnum Island & Landscape	24, 26, 29, 30, 35, 41, 42, 53, 57, 58, 59, 60, 64
Barnum Island Barnum's Small Boat House	Non-Wilderness	Recreational Resorts and Cottages	Determined Eligible – Barnum Island & Landscape	24, 26, 29, 30, 32, 35, 41, 42, 53, 57, 58, 59, 60, 64
Barnum Island Barnum's Large Boathouse	Non-Wilderness	Recreational Resorts and Cottages	Determined Eligible – Barnum Island & Landscape	24, 26, 29, 30, 32, 33, 35, 41, 42, 53, 57, 58, 59, 60, 64
Barnum Island Dunwoodie Cottage	Non-Wilderness	Recreational Resorts and Cottages	Determined Eligible – Barnum Island & Landscape	21, 24, 26, 29, 30, 35, 41, 42, 53, 57, 58, 59, 60, 64
Barnum Island Dunwoodie Privy	Non-Wilderness	Recreational Resorts and Cottages	Determined Eligible – Barnum Island & Landscape	24, 26, 29, 30, 35, 41, 42, 53, 57, 58, 59, 60, 64
Barnum Island Ray Cottage	Non-Wilderness	Recreational Resorts and Cottages	Determined Eligible – Barnum Island & Landscape	21, 24, 26, 29, 30, 35, 41, 42, 53, 57, 58, 59, 60, 64

Historic Structure	Wilderness Designation	Resource Category	NRHP Status	CRMP Page
Barnum Island Ray Privy	Non-Wilderness	Recreational Resorts and Cottages	Determined Eligible – Barnum Island & Landscape	24, 26, 29, 30, 35, 41, 42, 53, 57, 58, 59, 60, 64
Barnum Island Andrews Small Log Cabin	Non-Wilderness	Recreational Resorts and Cottages	Determined Eligible – Barnum Island & Landscape	24, 26, 29, 30, 35, 41, 42, 53, 57, 58, 59, 60, 64
Barnum Island Edward F. Andrews Cottage	Non-Wilderness	Recreational Resorts and Cottages	Determined Eligible – Barnum Island & Landscape	21, 24, 26, 29, 30, 35, 41, 42, 53, 57, 58, 59, 60, 64
Barnum Island Andrews Privy	Non-Wilderness	Recreational Resorts and Cottages	Determined Eligible – Barnum Island & Landscape	24, 26, 29, 30, 35, 41, 42, 53, 57, 58, 59, 60, 64
Barnum Island Smokehouse	Non-Wilderness	Recreational Resorts and Cottages	Determined Eligible – Barnum Island & Landscape	24, 26, 29, 30, 35, 41, 42, 53, 57, 58, 59, 60, 64
Barnum Island Frances Andrews Cottage	Non-Wilderness	Recreational Resorts and Cottages	Determined Eligible – Barnum Island & Landscape	21, 24, 26, 29, 30, 35, 41, 42, 53, 57, 58, 59, 60, 64
Rock Harbor Rock Harbor Lodge Guest House	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Evaluation Pending – Rock Harbor Historic District & Landscape	24, 26, 30, 31, 35, 42, 47, 48, 51, 53, 56, 57, 59, 64
Rock Harbor Spruces Cabin	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Evaluation Pending – Rock Harbor Historic District & Landscape	24, 26, 35, 42, 47, 53, 57, 59
Rock Harbor Farmer Cottage	Non-Wilderness	Recreational Resorts and Cottages	Determined Eligible	21, 24, 26, 32, 35, 42, 47, 53, 57, 59
Rock Harbor Farmer House	Non-Wilderness	Recreational Resorts and Cottages	Determined Eligible	21, 24, 26, 32, 35, 42, 47, 53, 57, 59
Rock Harbor Ralph House	Non-Wilderness	Recreational Resorts and Cottages	Not Yet Evaluated	24, 26, 42, 47, 53, 57, 59
Rock Harbor Lodge Dinner Bell	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Evaluation Pending – Rock Harbor Historic District & Landscape	24, 26, 42, 47, 53, 57, 59

Historic Structure	Wilderness Designation	Resource Category	NRHP Status	CRMP Page
Rock Harbor Housekeeping Cabin #1	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Evaluation Pending – Rock Harbor Historic District & Landscape	24, 26, 42, 47, 53, 57, 59
Rock Harbor Housekeeping Cabin #2	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Evaluation Pending – Rock Harbor Historic District & Landscape	24, 26, 42, 47, 53, 57, 59
Rock Harbor Housekeeping Cabin #3	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Evaluation Pending – Rock Harbor Historic District & Landscape	24, 26, 42, 47, 53, 57, 59
Rock Harbor Housekeeping Cabin #4	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Rock Harbor Historic District & Landscape	24, 26, 42, 47, 53, 57, 59
Rock Harbor Housekeeping Cabin #5	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Evaluation Pending – Rock Harbor Historic District & Landscape	24, 26, 42, 47, 53, 57, 59
Rock Harbor Housekeeping Cabin #6	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Evaluation Pending – Rock Harbor Historic District & Landscape	24, 26, 42, 47, 53, 57, 59
Rock Harbor Housekeeping Cabin #7	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Evaluation Pending – Rock Harbor Historic District & Landscape	24, 26, 42, 47, 53, 57, 59
Rock Harbor Housekeeping Cabin #8	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Evaluation Pending – Rock Harbor Historic District & Landscape	24, 26, 42, 47, 53, 57, 59
Rock Harbor Housekeeping Cabin #9	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Evaluation Pending – Rock Harbor Historic District & Landscape	24, 26, 42, 47, 53, 57, 59
Rock Harbor Housekeeping Cabin #10	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Evaluation Pending – Rock Harbor Historic District & Landscape	24, 26, 42, 47, 53, 57, 59
Rock Harbor Saginaw Lodge	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Evaluation Pending – Rock Harbor Historic District & Landscape	24, 26, 42, 47, 53, 57, 59
Rock Harbor Chippewa Lodge	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Evaluation Pending – Rock Harbor Historic District & Landscape	24, 26, 42, 47, 53, 57, 59
Rock Harbor Nokomis Lodge	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Evaluation Pending – Rock Harbor Historic District & Landscape	24, 26, 42, 47, 53, 57, 59
Rock Harbor Ojibway Lodge	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Evaluation Pending – Rock Harbor Historic District & Landscape	24, 26, 42, 47, 53, 57, 59
Rock Harbor NPS Visitor Center	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Evaluation Pending – Rock Harbor Historic District & Landscape	24, 26, 42, 47, 48, 53, 59
Rock Harbor Concessions Dormitory	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Evaluation Pending – Rock Harbor Historic District & Landscape	24, 26, 42, 47, 53, 59

Historic Structure	Wilderness Designation	Resource Category	NRHP Status	CRMP Page
Mott Island Residence #4	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Determined Eligible – Mott Island & Landscape	44, 47
Mott Island Residence #6	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Determined Eligible – Mott Island & Landscape	45, 47
Mott Island Pumphouse/ Generator Cooling System	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Determined Eligible – Mott Island & Landscape	44, 47
Mott Island Laundry Building	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47
Mott Island Photography Lab	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47
Mott Island Pipe Shed	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47
Mott Island Root and Storage Cellar	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47
Mott Island Rope House	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Determined Eligible	45, 47
Mott Island Radio Building	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47
Mott Island Sign Building	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47
Mott Island West Warehouse	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47
Mott Island East Warehouse and Offices	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47
Mott Island Isle Royale Headquarters Dock	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47
Mott Island Superintendent's Dock	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated as Historic Properties	45, 47
Mott Island Cook's Quarters	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47

Historic Structure	Wilderness Designation	Resource Category	NRHP Status	CRMP Page
Mott Island Ranger III Dock	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47
Mott Island Residence #3	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47
Mott Island Residence #17	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47
Mott Island Residence #18	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47
Mott Island Boathouse	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47
Mott Island Five Unit Apartment	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47
Mott Island Power House	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47
Mott Island "Butler" Storage Building	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47
Mott Island New Employee's Dormitory	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	45, 47
Malone Bay Ranger Station	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	44
Moose Exclosure (1)	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	23, 45
Moose Exclosure (2)	Non-Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	23, 45

Table 2: Historic Structures Located in Wilderness or Potential Wilderness. Management planning for these resources will be addressed in a forthcoming Wilderness Stewardship Plan.

Historic Structure	Wilderness Designation	Resource Type	NRHP Status	CRMP Pages
Minong Mine Wagon Road	Wilderness	Prehistoric and Historic Mining	Part of Minong Copper Mining District NHL – Listed 2021	19, 24, 29, 38, 39, 48, 51, 63
Minong Mine Blacksmith Shop Ruins	Wilderness	Prehistoric and Historic Mining	Part of Minong Copper Mining District NHL – Listed 2021	19, 24, 29, 38, 39, 51, 63, 64
Cemetery Island Grave Markers	Wilderness	Cemeteries and Burial Sites	N/A	8, 19, 40, 51, 52
Island Mining Co. Powder House	Wilderness	Prehistoric and Historic Mining	Evaluation Pending – Island Mine & Landscape	19, 29, 39, 40, 51
Bangsund Main Residence	Wilderness	Folk and Commercial Fisheries	Not Yet Evaluated. Not Eligible as a Fishery	19, 23, 50, 56
Bangsund Sleeping Cabin	Wilderness	Folk and Commercial Fisheries	Not Yet Evaluated. Not Eligible as a Fishery	19, 23, 50, 56
Bangsund Sleeping Cabin #2	Wilderness	Folk and Commercial Fisheries	Not Yet Evaluated. Not Eligible as a Fishery	19, 23, 50, 56
Holger Johnson Fishery & Resort	Wilderness	Folk and Commercial Fisheries	Not Yet Evaluated	19
Horner Cabin	Wilderness	Recreational Resorts and Cottages	Not Yet Evaluated	NA
Mount Ojibway Firetower	Wilderness	CCC, Mission 66, and Other NPS Infrastructure	NR Listed	19, 23, 44
Ishpeming Firetower	Wilderness	CCC, Mission 66, and Other NPS Infrastructure	NR Listed	19, 23, 44
Feldtmann Firetower	Wilderness	CCC, Mission 66, and Other NPS Infrastructure	NR Listed	19, 23, 44
Moose Exclosure (3)	Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	19, 23, 45
Moose Exclosure (4)	Wilderness	CCC, Mission 66, and Other NPS Infrastructure	Not Yet Evaluated	19, 23, 45
Holte Fishery Privy	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible – Holte Fishery/ Wright Island & Landscape	19
Holte Fishery Main Residence	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible – Holte Fishery/ Wright Island & Landscape	19

Historic Structure	Wilderness Designation	Resource Type	NRHP Status	CRMP Pages
Holte Fishery Mike Johnson Residence Kitchen Addition	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible – Holte Fishery/ Wright Island & Landscape	19
Fisherman's Home Rude Guest Cabin	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible – Fisherman's Home & Landscape	19, 42, 50
Fisherman's Home Rude Residence	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible – Fisherman's Home & Landscape	19, 42, 50
Fisherman's Home Rude Privy	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible – Fisherman's Home & Landscape	19, 42, 50
Fisherman's Home Dry-Laid Stone Wall	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible – Fisherman's Home & Landscape	19, 42, 50
Fisherman's Home Rude Storeroom	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible – Fisherman's Home & Landscape	19, 42, 50
Fisherman's Home Tool Shed	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible – Fisherman's Home & Landscape	19, 42, 50
Fisherman's Home Rude Smoker	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible – Fisherman's Home & Landscape	19, 42, 50
Fisherman's Home Help's Quarters #1	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible – Fisherman's Home & Landscape	19, 42, 50
Fisherman's Home Help's Quarters #2	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible – Fisherman's Home & Landscape	19, 42, 50
Fisherman's Home Rude Fish House	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible – Fisherman's Home & Landscape	19, 42, 50
Fisherman's Home Rude Net House	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible – Fisherman's Home & Landscape	19, 42, 50
Amygdaloid Island Ranger Station Anderson/Scotland Residence	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible	NA
Johns Island Johns Cottage	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible – Johns Island	NA
Johnson Island Anderson Main Cabin	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible – Anderson Fishery	19, 42
Johnson Island Anderson Privy	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible	19, 42
Johnson Island Herman Johnson Cottage	Potential Wilderness Area	Folk and Commercial Fisheries	Not Yet Evaluated	19, 42

Historic Structure	Wilderness Designation	Resource Type	NRHP Status	CRMP Pages
Johnson Island John Anderson Cottage	Potential Wilderness Area	Folk and Commercial Fisheries	Not Yet Evaluated	19, 42
Johnson Island Anderson log sleeping cabin	Potential Wilderness Area	Folk and Commercial Fisheries	Determined Eligible	19, 42
Tobin Harbor Mattson Fishery Cottage	Potential Wilderness Area	Folk and Commercial Fisheries	NR Listed – Tobin Harbor Historic District	19, 41, 42
Tobin Harbor Mattson Fishery Storage Building	Potential Wilderness Area	Folk and Commercial Fisheries	NR Listed – Tobin Harbor Historic District	19, 41, 42
Tobin Harbor Mattson/Anderson Fishery Cottage	Potential Wilderness Area	Folk and Commercial Fisheries	NR Listed – Tobin Harbor Historic District	19, 41, 42
Tobin Harbor Mattson Fishery Fish House	Potential Wilderness Area	Folk and Commercial Fisheries	NR Listed – Tobin Harbor Historic District	19, 41, 42
Tobin Harbor Mattson Fishery Fishing Shed	Potential Wilderness Area	Folk and Commercial Fisheries	NR Listed – Tobin Harbor Historic District	19, 41, 42
Tobin Harbor Mattson Fishery Privy	Potential Wilderness Area	Folk and Commercial Fisheries	NR Listed – Tobin Harbor Historic District	19, 41, 42
Tobin Harbor Edwards Cottage	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Edwards Dining Room	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Edwards Store House	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Edwards Privy	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Edwards "The Gem"	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Dassler Cottage	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Dassler Guest House	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Dassler Privy	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Snell Cottage	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41

Historic Structure	Wilderness Designation	Resource Type	NRHP Status	CRMP Pages
Tobin Harbor Snell Guest House	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Snell Store House	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Snell Writing Shack	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Siefert Cottage	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Siefert Storage Building	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Siefert Privy	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Connolly Cottage	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Connolly Guest House	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Dassler Boat House	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Connolly Privy	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Kemmer Residence	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Kemmer Guest House	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Kemmer Store House	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Kemmer Boat House	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Kemmer Privy	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Kemmer Steps	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Gale Cottage	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41

Historic Structure	Wilderness Designation	Resource Type	NRHP Status	CRMP Pages
Tobin Harbor Gale Tool Shed	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Gale Guest Cottage	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Gale Privy	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Beard Cottage	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Beard Storage Building	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Merritt Cottage	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Merritt "Parsonage"	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Merritt "Deer House"	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Merritt "Moose Manor"	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Merritt Privy	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Merritt Wood Shed	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor How Cabin	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor How Guest Cabin	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Minong Lodge Cabin	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Stack Cottage	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Stack Guest House	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Tobin Harbor Stack Privy	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41

Historic Structure	Wilderness Designation	Resource Type	NRHP Status	CRMP Pages
Tobin Harbor Stack Retaining Wall	Potential Wilderness Area	Recreational Resorts and Cottages	NR Listed – Tobin Harbor Historic District	19, 41
Crystal Cove Megeath Residence	Potential Wilderness Area	Recreational Resorts and Cottages	Determined Eligible – Crystal Cove Cultural Landscape	19, 41
Crystal Cove Megeath Main Lodge	Potential Wilderness Area	Recreational Resorts and Cottages	Determined Eligible – Crystal Cove Cultural Landscape	19, 41
Crystal Cove Megeath Guest Cabin #1	Potential Wilderness Area	Recreational Resorts and Cottages	Determined Eligible – Crystal Cove Cultural Landscape	19, 41
Crystal Cove Megeath Guest Cabin #2	Potential Wilderness Area	Recreational Resorts and Cottages	Determined Eligible – Crystal Cove Cultural Landscape	19, 41
Crystal Cove Megeath Generator House	Potential Wilderness Area	Recreational Resorts and Cottages	Determined Eligible – Crystal Cove Cultural Landscape	19, 41
Crystal Cove Megeath Storage Shed	Potential Wilderness Area	Recreational Resorts and Cottages	Determined Eligible – Crystal Cove Cultural Landscape	19, 41
Crystal Cove Megeath Smokehouse	Potential Wilderness Area	Recreational Resorts and Cottages	Determined Eligible – Crystal Cove Cultural Landscape	19, 41
Crystal Cove Megeath Boardwalk	Potential Wilderness Area	Recreational Resorts and Cottages	Determined Eligible – Crystal Cove Cultural Landscape	19, 41
Crystal Cove Megeath Fuel Shed Ruin	Potential Wilderness Area	Recreational Resorts and Cottages	Determined Eligible – Crystal Cove Cultural Landscape	19, 41
Captain Kidd Island McPherran Cottage	Potential Wilderness Area	Recreational Resorts and Cottages	Determined Eligible – Captain Kidd Cultural Landscape	19, 41
Captain Kidd Island McPherran Sleeping Cabin #1	Potential Wilderness Area	Recreational Resorts and Cottages	Determined Eligible – Captain Kidd Cultural Landscape	19, 41
Captain Kidd Island McPherran Sleeping Cabin #2	Potential Wilderness Area	Recreational Resorts and Cottages	Determined Eligible – Captain Kidd Cultural Landscape	19, 41
Captain Kidd Island McPherran Sleeping Cabin #3	Potential Wilderness Area	Recreational Resorts and Cottages	Determined Eligible – Captain Kidd Cultural Landscape	19, 41
Captain Kidd Island McPherran Boat House	Potential Wilderness Area	Recreational Resorts and Cottages	Determined Eligible – Captain Kidd Cultural Landscape	19, 41
Captain Kidd Island McPherran Bath House	Potential Wilderness Area	Recreational Resorts and Cottages	Determined Eligible – Captain Kidd Cultural Landscape	19, 41
Captain Kidd Island McPherran Tool Shed	Potential Wilderness Area	Recreational Resorts and Cottages	Determined Eligible – Captain Kidd Cultural Landscape	19, 41

Historic Structure	Wilderness Designation	Resource Type	NRHP Status	CRMP Pages
Captain Kidd Island McPherran Flagpole	Potential Wilderness Area	Recreational Resorts and Cottages	Determined Eligible – Captain Kidd Cultural Landscape	19, 41
Davidson Island Davidson House	Potential Wilderness Area	Recreational Resorts and Cottages	Determined Eligible	42

Part 2 – Responses to Comments

The ISRO CRMP/EA first became available for public review and comment on August 6, 2019. Opportunities to comment were advertised through press releases, posts to the park website, targeted outreach, and an announcement on the NPS PEPC website. The NEPA public review and comment period ended September 6, 2019. A total of 43 unique correspondences were received via e-mail, mail, and on the PEPC website. All correspondences received during the public comment period were considered and are now part of the administrative record for this plan. Included among these correspondences were individual public comments and letters from official representatives of the following agencies and organizations:

- Advisory Council on Historic Preservation
- Coalition to Protect America’s National Parks
- National Trust for Historic Preservation
- Isle Royale Families and Friends Association
- Office of U.S. Senator Debbie Stabenow
- Sierra Club
- Apostle Islands Historic Preservation Conservancy
- National Parks Conservation Association
- Rock of Ages Lighthouse Preservation Society
- Washington Trust for Historic Preservation
- Michigan State Historic Preservation Office

The National Park Service collected comments in order to understand perspectives on the draft plan. In the NEPA process, thoughts and ideas from individuals, organizations, and agencies are analyzed and considered equally. For this reason, the unique content of comments, rather than the number of times a comment was received, was analyzed to determine if refinements to the final plan were necessary.

Correspondence received during the comment period was analyzed in stages. Staff read each piece of correspondence to identify discrete points expressed by the author, each of which is considered as a “comment.” Comments were reviewed as “in-scope” or “out of scope,” as well as “substantive” and “non-substantive.” In-scope comments were those that addressed the structure and findings of the CRMP/EA, while out-of-scope comments included those comments addressing issues unrelated to the CRMP/EA. A substantive comment is defined by

NPS Director's Order 12 (section 4.6A of the 2015 NPS NEPA Handbook) as one that does the following:

- Question, with a reasonable basis, the accuracy and adequacy of information in the environmental analysis.
- Present reasonable alternatives other than those presented in the environmental analysis.
- Cause change or revisions in the proposal.

Consistent with Council on Environmental Quality guidelines and NPS Management Policies, comments in favor of or against the proposed action or alternatives or comments that only agree or disagree with NPS policy, are not considered substantive. Similar substantive comments were grouped together to develop unique “concern statements.” Concern statements summarize the main points or common themes expressed across one or more substantive comments and are presented either as requests for changes to the plan, or as requests for additional information. Concern statements address either the planning and NEPA process or the actions and alternatives of the plan. The following two sections include the concern statements followed by the NPS response to the statement. The statements are grouped as to whether they are associated with the planning and NEPA process or with proposals for edits to the plan. “Use” of historic structures is covered in both sections because of the nature of the comments received.

There is no requirement for the National Park Service to respond to out-of-scope comments, non-substantive comments (such as personal opinions), or comments that misrepresent the proposed action. The NPS did, however, respond to several of these types of comments for the purpose of clarity.

Concern Statements Addressing the Planning and NEPA Process

The following concern statements (in *bold italics*) summarize comments received that relate to the planning process or the way the NPS executed NEPA and NHPA reviews.

Support for Alternatives. As stated, personal preferences and general statements of support or disagreement with proposals of the plan or NPS policy are not substantive. However, when support was expressed, a vast majority of individual commenters preferred alternative B, some support was expressed for alternative C, and no comments included support for alternative A.

Concern over not including management planning for cultural resources in wilderness and potential wilderness as a part of the CRMP/EA.

Commenters indicated both support and opposition for the NPS decision to separate management planning for cultural resources into two planning processes. These concerns are neither substantive nor within the scope of the CRMP/EA, which states that its scope is limited to actions outside of wilderness and potential wilderness. The NPS decision to present management planning in separate documents for wilderness and non-wilderness has no direct or cumulative impact on resources. The National Park Service understands the public interest in management planning for cultural resources in wilderness and intends to continue the wilderness stewardship planning process along with the associated consultation under Section 106 of the National Historic Preservation Act. In addition to the concern posed over the scope of this CRMP/EA, many commenters posed questions and concerns associated with treatment

proposals for historic structures in wilderness, particularly in Tobin Harbor, as well as comments related to case law associated with court decisions concerning historic preservation in wilderness. None of these comments are within the scope of the CRMP/EA, which does not propose treatment strategies for historic structures in wilderness or potential wilderness.

“Potential Wilderness” is not a meaningful designation. The National Park Service should limit its management framework to Wilderness Areas and Non-wilderness Areas.

One commenter suggested that the National Park Service is wrong to consider wilderness character and wilderness management for areas that have been designated as “Potential” wilderness. However, NPS *Management Policies 2006* requires the park to do so (NPS *Management Policies 2006*, Section 6.2.2.1). A designation of Potential Wilderness indicates Congress’s intent for these areas to become designated wilderness upon the discontinuation of temporary nonconforming or incompatible conditions. Cultural resource treatments in potential wilderness areas are out of the scope of the CRMP/EA.

The potential for future addition of structures, either relocated or built, to the historic landscapes of Rock Harbor and Barnum Island should be considered a significant adverse impact and/or an adverse effect under Section 106 of the National Historic Preservation Act.

Several commenters indicated that the possible adverse effects to the historic character of the Rock Harbor and Barnum Island landscapes associated with the relocation or construction of new facilities in those areas (described on page 57) should be considered significant or should be considered as an adverse impact under Section 106 of the National Historic Preservation Act. However, as indicated in the same section of the document, and on page 26 within the alternative description, these actions, if implemented, would only be undertaken under the guidance of completed and evaluated cultural landscape reports, sufficiently mitigating any adverse impacts. These documents would be developed in consultation with the state historic preservation office. “Infill” of historic landscapes, when guided by historic treatment reports, is a best practice for historic preservation that allows historic landscapes to remain relevant and useful to the public, in turn helping to ensure their continued preservation.

Concern that the concept of ongoing “use” by descendent families associated with historic cottages and fisheries imparts an aspect of historic integrity to these resources, and that the National Park Service has not sufficiently described this use nor taken it into account the impact to these resources if life leases, special use permits, and volunteer agreements that allow exclusive occupancy of structures by descendent families are discontinued.

Some commenters indicated that the NPS decision to not reissue life leases and to potentially discontinue exclusive occupancy could present an adverse impact to historic structures or districts in the park. “Use,” be it by traditionally associated peoples or otherwise, is not one of the seven aspects of integrity by which a historic property is evaluated for its ability to convey associations for which it was determined significant and eligible for national register listing. For retention of integrity, “use” is a standard that is only considered in relation to the physical characteristics of a property, i.e., how modification to a structure necessary to allow it to serve a new use could impact its historic character. Under this consideration, use is important, and it is

true that a change in use that would necessitate changes to the character-defining features of a historic property would constitute an adverse effect. However, the selected alternative of the CRMP/EA proposes no such modifications to any historic structures. In fact, the CRMP/EA envisions future uses that are sympathetic to, or continuations of, historic types of uses. All actions within the plan follow the *Secretary's Standards for the Treatment of Historic Properties*, with no expected adverse impacts to the properties.

Concern that relevant historic research, including ethnographic studies and National Register of Historic Places nominations should be completed before planning for resource management and completion of the CRMP/EA.

Several commenters suggested that the NPS should complete a variety of cultural resource documentation projects prior to engaging in management planning or finalizing the CRMP/EA. However, a stated purpose of the plan is to provide guidance on how the park shall prioritize the limited staff time and resources available for documentation of the park's cultural resources. Development of the CRMP/EA and the actions of the selected alternative will allow the park to prioritize documentation needs. Refer to page A-04, Appendix B, "Cultural Resource Inventory and Evaluation Needs." This appendix documents a list of needed studies and documentation, some of which would be required prior to execution of actions under the CRMP/EA.

Concern that the comment period was too short and a desire for additional consultation time.

One commenter suggested that the comment period was too short and questioned its legality. The CRMP/EA was shared with the public in August 2019 with a 30-day public comment period ending September 2019. It is an NPS best practice to provide a 30 calendar-day comment period before a Finding of No Significant Impact (FONSI) is signed. Under *U.S. Department of Interior NEPA regulations*, the National Park Service is not required to request public comment on environmental assessments (43 CFR §46.305 – Public involvement in the environmental assessment process). Additionally, the opportunity for Section 106 NHPA comment and engagement is only now coming to an end nearly two years after the request.

Concern Statements Proposing Edits or Posing Questions of the Plan

The following concern statements (in ***bold italics***) summarize comments received that propose edits to the alternatives or ask questions of the intent behind the plan. The NPS response follows each statement.

The selected alternative should include allowing descendent families with associations to historic structures to continue to access the structures and/or retain exclusive occupancy of the structures.

The proposed management strategies presented in the CRMP/EA for historic fishery and cottage structures in non-wilderness do not preclude access to these structures by descendent families. Discontinuation of life leases and special use permits (upon their expiration) for exclusive occupancy is a part of the plan. Providing appropriate and controlled public access to the publicly owned resources of the park is a component of all alternatives. However, the park expects to provide opportunities for continued use of historic properties by descendent families

via partnerships with organizations that will aid the park with maintenance, interpretation, and historic demonstrations. It is expected that most fishery and cottage resources will require several weeks of maintenance (including opening and closing operations) per season, during which time overnight access to the structures may be available to partners. Other opportunities would likely exist for activities such as interpretive programs and history demonstrations.

The selected alternative should include allowing descendent families with associations to historic structures a preference for developing future partnerships.

Several commenters indicated that a preference should be created for establishing partnerships with descendent families, both for the maintenance and use of associated structures and for their potential to serve in interpretation and living history roles. On page A-12, the CRMP/EA states: “The NPS recognizes the commitment of individuals and descendent families with associations to specific structures and historic camps, and fully expects to continue relationships with these individuals as members of partner organizations.” The park expects opportunities for a continued relationship with these families both in the preservation of historic properties and in the development and execution of history demonstrations and interpretive programs.

Could the documentation efforts under alternative C be implemented even if B is selected?

One commenter inquired whether the enhanced research and documentation efforts presented under alternative C could be pursued, even if alternative B was selected. One of the stated purposes of the CRMP/EA is to help the park prioritize cultural resource activities. Some of the management and treatment actions under the selected alternative require additional research and documentation before they can be implemented. Park staff will prioritize those documentation and research efforts to accomplish objectives of the selected alternative. Nevertheless, many of the research and documentation efforts presented in alternative C could be acted upon in the future; their inclusion and analysis in the CRMP/EA could allow for future implementation, likely outside the lifespan of this plan.

Open Daisy Farm to visitors, perhaps as an alternative to new visitor infrastructure at Rock Harbor.

Some commenters suggested that the park should spread visitation away from Rock Harbor and suggested Daisy Farm as an alternate site. Daisy Farm is currently open to visitors. The area has a campground, dock, and picnic shelter, and the CRMP/EA proposes more visitor infrastructure associated with an increase in on-site interpretation of the Ransom Smelter (see page 26 of the CRMP/EA). The Daisy Farm area is not however, a fully feasible alternative to visitor infrastructure at Rock Harbor because it lacks access to significant infrastructure such as electricity, water, wastewater treatment, and overnight lodging facilities.

The selected alternative should preserve all structures that have associated descendent families.

One comment suggested that the CRMP/EA should ensure the preservation of historic structures that still have families interested in their use. Other commenters were opposed to allowing structures to deteriorate or be removed. The portion of these comments that relate to

structures in wilderness are out of scope of the CRMP/EA, which addresses management of historic structures in non-wilderness areas only. The CRMP/EA includes rehabilitation and restoration actions for all historic buildings in non-wilderness.

The establishment of “youth camps” at Barnum Island could damage the site; they would result in too much visitation pressure.

One commenter was concerned that the establishment of youth camps at Barnum Island and adaptive use of historic structures to house participants could damage the integrity of the property. A purpose of the CRMP/EA is to provide additional educational opportunities and access to underutilized cultural resources in non-wilderness, while promoting restoration, rehabilitation, and, where appropriate, adaptive reuse of historic properties. Current visitation at Barnum Island is low and the selected alternative includes rehabilitation to accommodate overnight lodging for educational programs. The park would actively manage and monitor future opportunities at the island to ensure that capacity is not exceeded.

The selected alternative should develop more interpretive opportunities, including trails and waysides, especially at Windigo.

Actions in the CRMP/EA include additional onsite interpretation of mining resources and relocation and onsite preservation of a historic Wendigo Copper Company Wagon at the Windigo site. Additional actions to improve visitor experience at Windigo are included in the Windigo Comprehensive Development Concept Plan, referenced on page A-10 of the CRMP/EA.

The selected alternative should provide more specifics about the future lighthouse-keeper-in-residence program for the Isle Royale Lighthouse. The alternative could also include a boat-builder-in-residence program and should better describe the specific methods for the preservation and restoration of vernacular boats. Similarly, field methods for preservation of resources and opportunities for specific public archeology projects should be provided.

The CRMP/EA is a comprehensive management plan that is dependent on funding and, in some cases, upon the development of implementation level plans for specific projects. The design and staffing of individual archeological projects and field preservation methods for specific resources mentioned in the plan will be determined by best management practices as funding becomes available. While a lighthouse keepers' program is a goal of the plan, several steps must be taken before it is realized. Development of a boat building program is not precluded by the CRMP/EA and would be consistent with the plan. It could be considered in the future, as could other interpretation and programming opportunities as funding and staff or partnerships become available. Actions such as these may require additional analysis, depending on proposed impacts and scope.

The selected alternative should consider deaccessioning museum collections to make room for new materials.

Deaccessioning is a regular museum management activity that is guided by the park's Scope of Collection. The National Park Service may deaccession items according to the Park's Scope of

Collection statement at any time. This routine action is not included in the CRMP/EA but is utilized as appropriate and consistent with museum management guidance.

Within the mitigations the document should specify that contractors and subcontractors should be qualified relative to the work they are undertaking in association with cultural resources.

A commenter expressed concern that contractors doing work with historic properties should be qualified. Page 36 of the CRMP/EA includes mitigation measures that outline appropriate treatment standards and documentation and evaluation standards that meet the Secretary of the Interior's Standards for Historic Preservation. All treatment of historic properties and contracted research will follow the Secretary of Interior's standards and all work with cultural resources would be overseen by individuals that meet Secretary of Interior's professional standards. There are no Secretary of Interior or NPS standards for qualifications of contractors or subcontractors completing construction projects specifically relative to historic properties. However, prior experience with historic property restoration is a typical evaluation criterion for contract proposals and would be considered for any contracted work at the park.

Include the development of Oral Histories, particularly among descendants of fisher communities, in the alternative and in appendix B.

Oral history collection is a tool of ethnographic research and would be a component of the Ethnographic Research identified in the CRMP/EA on page A-05.

The history presented in chapter 1 lacks reference to homesteading on the island.

The background section of the CRMP/EA (pages 2-3) provides a brief history of human activity on Isle Royale including surviving cultural resources associated with mining, fishing, and tourism. Other academic publications provide additional details related to Isle Royale's human history. Information related to homesteading activities or other means of initial European settlement is not necessary to describe actions proposed in the CRMP/EA or the potential environmental impacts.