

Isle Royale National Park

U.S. Department of the Interior
National Park Service



Wilderness Stewardship Plan and Draft Environmental Impact Statement



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APPENDIX A: REFERENCES AND GLOSSARY

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GLOSSARY

Adverse Impacts—Potential effects of an action that could be reasonably foreseen to diminish the quality of park resources, including wilderness character.

Aircraft—Any device that is used or intended to be used for human flight in the air, including powerless flight. (See 36 CFR 1.4, Definitions).

Aircraft, landing of—Bringing down to the surface of the earth (land, water, snow, or ice) any aircraft or anything attached to or carried by an aircraft, during or after a flight.

Artifact—An object made by a person, typically an item of cultural or historical interest.

Backcountry—The NPS uses the term “backcountry” to refer to primitive, undeveloped portions of parks. Backcountry is not the same as wilderness. Rather, it refers to a general condition of land that may include wilderness. Management of the wilderness portions of the parks require different administrative practices than backcountry because the Wilderness Act and NPS Management Policies impose additional conditions and constraints.

Boardwalk—A walkway that crosses over water or marshy ground, typically made of wood or other smooth materials.

Cultural Landscape—A geographic area, including both cultural and natural resources and the wildlife or domestic animals, associated with an historic event, activity, or person exhibiting other cultural or aesthetic values.

Cultural Resource—An aspect of a cultural system that is valued by or representative of a culture or that contains information about a culture.

Designated Wilderness—Federal land designated by Congress as wilderness and a component of the National Wilderness Preservation System where the NPS is required to manage according to the Wilderness Act of 1964.**Emergency**—A situation that requires immediate action because of imminent danger to the health or safety of people.

Environmentally Preferable Alternative—The alternative that causes the least damage to the biological and physical environment, and which best protects, preserves, and enhances historic, cultural, and natural resources.

Ethnographic Resource—A resource under NPS stewardship that is of cultural significance to peoples traditionally associated with it.

Extent Necessary Determination—Determining the extent to which commercial services are necessary in wilderness and allocating use is a combination of assessing the public need and management objectives and matching it to wilderness resource capabilities. A typical approach may include the following components: (1) Assess the need for the type and amount of commercial services that could be provided; (2) Estimate the capacity of the area to accommodate commercial and non-commercial visitor use without impairment of wilderness character; (3) Determine the amount of total use that is to be allocated to visitors utilizing commercial services vs. non-commercial visitors; and (4) Express the extent of commercial services necessary in terms of amount, type, location, and timing.

Frontcountry—Outdoor areas that are easily accessible by vehicle, such as those near established roads and trails.

Fundamental Resource—The features, systems, processes, experiences, stories, scenes, sounds, smells, or other attributes determined to warrant primary consideration during planning and management processes because they are essential to achieving the purpose of the park and maintaining its significance.

Habitation—The state or process of living in a particular place.

Historic Structures—A constructed work, usually immovable by nature or design, consciously created to serve some human activity.

Inholding—Land owned or managed by an entity other than the NPS that is within the designated, recommended, proposed, eligible wilderness boundary.

Installation—Anything made by humans that is not intended for human occupation and is left unattended or left behind when the installer leaves the wilderness.

Isolation—The state of separation from other people or evidence of human activity.

Mechanical Transport—Any vehicle, device, or contrivance for moving people or material in or over land, water, snow, ice, or air that has moving parts as essential components of the transport and which apply a mechanical advantage, regardless of power source. This includes (but is not limited to) wheeled vehicles, devices, or contrivances, such as bicycles, Segways™ and other Electric Personal Assistance Mobility Devices, game carriers, carts, wheelbarrows, and wagons. Mechanical transport does not include skis, snowshoes, sleds, travois, non-motorized river craft including drift boats, rafts, or canoes, or similar primitive devices. Wheelchairs or other mobility devices that meet the definition of “wheelchair” in the Americans with Disabilities Act, section 508(c) are not prohibited in wilderness.

Minimum Requirements Analysis (MRA)—A two-step process, based on section 4(c) of the Wilderness Act, that documents (1) the determination as to whether or not a proposed management action is necessary for the administration of the area as wilderness and does not have a significant impact to the wilderness resources and character; and (2) the determination of the management activity (method or tool) that causes the least amount of impact to the wilderness resources and character.

Motorboat—Any type or description of craft, other than a seaplane on the water, used or capable of being used as a means of transportation on water that is powered by a motor, engine, or other non-living power source. This includes, but is not limited to, airboats and personal watercraft.

Motorized Equipment—Any machine that applies force by transferring energy from a motor, engine, or other non-living power source. This includes, but is not limited to, such machines as aircraft, drones, snowmobiles, motorboats, chainsaws, weed whackers, power drills, power saws, generators, compressors, windmills or turbines, and snow or leaf blowers. Motorized equipment does not include shavers, wrist watches, clocks, flashlights, cameras, camping stoves, solar panels, batteries, explosives, Geiger counters, cellular telephones, portable electronic media devices, radio receivers or transmitters, GPS units, or other similar small, battery-powered, hand-carried personal camping equipment.

Motor Vehicle—Any vehicle that is self-propelled, including any vehicle that is propelled by electric power but not operated on rails or upon water. This includes, but is not limited to cars, trucks, all-terrain vehicles and motorcycles. (See 36 CFR 1.4, Definitions).

Natural—Ecological systems which are substantially free from the effects of modern civilization.

Occupation—The action or fact of living in or using a building or other place.

Other Features of Value—Attributes not required of or found in every wilderness that reflect the wilderness character of a specific wilderness. Based on the last clause of section 2(c) of the Wilderness Act which states that a wilderness “may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.” It captures important elements of the wilderness that are not covered in the other four qualities of wilderness character, such as cultural or paleontological resources.

Permit—An official authorization issued by an agency or public official to conduct some activity.

Potential Wilderness—Lands which possess wilderness characteristics which would normally qualify them for designation within the National Wilderness Preservation System but contain temporary non-conforming or incompatible conditions (such as structures or roads) or uses (such as in-holdings, valid mining claims or operations) which prevent their being immediately designated as wilderness. These lands may be identified as “potential wilderness” in NPS wilderness proposals, wilderness recommendations, and by Congress in legislation designating other portions of a park as wilderness. Designated potential wilderness should be converted to designated wilderness once the non-conforming uses have been extinguished by publishing a notice in the Federal Register.

Potential Wilderness Addition—Lands in Isle Royale National Park designated as Potential Wilderness by Public Law 94-567.

Preferred Alternative—The alternative which the agency believes would fulfill its statutory mission and responsibilities, giving consideration to economic, environmental, technical and other factors.

Road, Temporary—A route constructed, maintained or used by motor vehicles or mechanical transport for a finite period of time

Primitive Recreation—Camping and activities performed outdoors by nonmotorized and nonmechanical means, emphasizing self-reliance and personal skills to travel and camp.

Reservation—A plan to use a service that is communicated in advance so that the service can be kept available for use at a designated time. The reservation system for campgrounds in wilderness proposed under alternative C would allow access to campsites at particular campgrounds in wilderness on a fixed itinerary.

Scoping—Scoping is done during the initial phase of project planning to seek input from a variety of sources. This input is used to identify issues, areas requiring additional study, alternative methods and locations, and topics to be analyzed in the National Environmental Policy Act document. Scoping is done internally with NPS staff and externally with the interested public, other agencies, and stakeholders.

Scenic Quality—The visual composition of a viewshed, including vividness, visual harmony, and landscape character integrity.

Solitude—The state of being alone or remote from habitations or the sights and sounds of other people; the experience of being in an unfrequented or secluded place.

Stewardship— the act of ensuring the long-term care and preservation of resources.

Structure—Anything made by humans that is intended for human occupation, or their possessions, and is left behind when the builder leaves the wilderness.

Sustainable—Allowing the unimpaired enjoyment of park resources for future generations.

Traditional Use—Non-recreational use for cultural purposes associated with an ethnographic connection to park resources.

Trail—A designated pathway that is closed to vehicular traffic, such as a boardwalk, foot trail, or bikeway.

Trust Resources—Property and interests that are held in trust by the United States for the benefit of a Tribe or individual Indians.

Undeveloped—Retaining its primeval character and influence, and is essentially without permanent improvement or modern human occupation.

Untrammeled—Essentially unhindered and free from the intentional actions of modern human control or manipulation.

Vernacular Boats—Includes handmade wooden fishing boats as large as approximately 30 feet in length which are in various conditions and at locations throughout the island.

Wilderness—For the purpose of applying NPS policies, wilderness includes the categories of eligible, proposed, recommended, and designated wilderness. Potential wilderness may be a subset of any of these categories.

Wilderness Act—A law which formally recognized wilderness as “an area where the earth and its community of life are untrammeled by man.” It created the National Wilderness Preservation System which dedicated acres of federal lands as wilderness. The law was passed by Congress into law in 1964.

Wilderness Character—The combination of biophysical, experiential, and symbolic ideals that distinguishes wilderness from other lands. The five qualities of wilderness character are Untrammeled, Undeveloped, Natural, Solitude or a Primitive and Unconfined Type of Recreation, and Other Features of Value.

Wilderness Qualities—One or more of the five qualities of wilderness character: Untrammeled, Undeveloped, Natural, Solitude or a Primitive and Unconfined Type of Recreation, and Other Features of Value.

APPENDIX B: ISSUES AND IMPACT TOPICS NOT CARRIED FORWARD FOR DETAILED ANALYSIS

Wilderness Character – Untrammeled. The National Park Service (NPS) has historically taken and currently takes actions that detract from the untrammeled quality of wilderness, including fire management (i.e., removal of vegetation to address fire risks or alteration of vegetation dynamics through suppression of natural fire ignitions), removal of invasive and exotic species, and the reintroduction of wolves, all of which manipulate or seek to control aspects of the biophysical environment and processes in Isle Royale’s wilderness. Descriptions of these plans and activities and their impacts separate from the impacts of the proposed action can be found in chapter 3 under “Wilderness Character” and chapter 4 under “Wilderness Character.” These activities would not change under this plan and would continue with restraint as described in their respective plans and guidance documents. Because no new programs or restoration efforts are proposed under this plan involving trammeling and because this plan would not add to the cumulative effects of the plans and activities noted above, analysis of this quality of wilderness character has been dismissed.

Other Features of Value: Scenic Features and Research. The park has scenic values that could be impacted by the proposed alternatives. Historic structures and other developments are visible from wilderness portions of the park, and these developments affect the scenic quality of wilderness. Removal of historic and non-historic structures and installations would result in beneficial impacts to the scenic quality of Isle Royale wilderness. Preservation of existing historic structures in wilderness would not result in noticeable changes to the scenic quality. None of the alternatives evaluated would change current research and science on the island. Under the action alternatives, research activities and overnight use of the Bangsund Cabin and associated structures would be relocated to nonwilderness as soon as an alternative site is available; however, this action would not impact research activities in wilderness. Any research that would occur would be guided by the Research Strategy and other NPS guidance (see “Appendix C: Isle Royale National Park Research Strategy” and “Appendix D: General Conditions for Scientific Research and Collecting Permit”). Because none of the actions have the potential to significantly impact research quality or scenic views in the park, these topics were dismissed from further analysis.

Air Quality. No management actions under consideration in this Draft Wilderness Stewardship Plan/Environmental Impact Statement (plan/EIS) would substantially alter air quality at the park or affect the designation of the park as a Class I air shed. Any emissions associated with management actions considered under this plan, which may include, for example, the rerouting or removal of bridges and trails or changes in chainsaw use are expected to be at *de minimis* levels and have no potential for measurable impacts to air quality. Project-specific activities such as bridge removal would require site-specific planning and analysis that would contain an analysis of air quality impacts, including analysis of greenhouse gases (i.e., carbon dioxide-equivalent and biogenic greenhouse gas emissions). While the use of mechanical or powered tools, if selected, could result in a slight degradation of air quality in localized areas, effects would not exceed National Ambient Air Quality Standards and would last only as long as project activities. Therefore, this topic was dismissed from any further analysis.

Soundscapes. Natural sounds contribute to the “solitude” quality of wilderness character, while intrusive human-caused or mechanical sounds, or noise, detract from this quality of wilderness and from the experience of solitude in wilderness. Various current and proposed management and recreational activities, such as the use of mechanized equipment and vehicles, including seaplanes and motorized boats would continue to occur adjacent to wilderness. Noise from this adjacent use can result in noise that degrades these qualities of wilderness. These impacts would be localized or may affect larger areas of the

park. This plan is not proposing changes to nonwilderness commercial use authorizations or concessions contracts that would affect the use of seaplanes in the park; therefore, noise generated by seaplanes is not analyzed in the EIS. While this plan does not include any policies or actions that would directly result in changes in the use of motorized boats in the park, proposed changes to campgrounds that are accessible by water may indirectly affect the use of motorized boats in localized areas. Therefore, this EIS discusses indirect effects to the solitude quality as a result of changes in the use of motorized boats in specific areas. However, most noise impacts as a result of the proposed action would be intermittent and temporary. Impacts to natural soundscapes as a result of the proposed action are included in the discussion of wilderness character.

Soils. Geologic features and soils are part of the natural quality of wilderness. Recreational use, construction, and periodic maintenance, particularly near frequently accessed areas of the park such as along trails and at campgrounds, can all affect soils. Impacts on soils may include erosion along trails and around campsites and would be localized. Soils are part of the natural quality of wilderness. Impacts to soils are considered in the context of wilderness character in this plan. Therefore, this topic was dismissed from further analysis.

Aquatic Resources. Aquatic resources contribute to the “natural” quality of wilderness character. At Isle Royale, inland lakes and streams are in wilderness and contribute to the natural quality. Human activities in campgrounds and along trails adjacent to inland lakes and streams at the park could affect aquatic resources through soil erosion or introduction of contaminants or invasive exotic aquatic species. Potential impacts to lakes also exist from the threat of invasive species such as zebra mussels and quagga mussels, which can populate the inland lakes (such as Richie and Chickenbone Lakes) that support shell growth for these species. The park currently manages for invasive species through visitor education and the prohibition of live bait in the Superintendent’s Compendium. This plan/EIS does not propose changes to that management. Any impacts to aquatic resources from potential management of bridges, including rerouting, removal, or improvements, would be limited in extent to the duration of the construction. Construction projects would not last more than one season for each action. Construction design would include actions to avoid or minimize potential impacts to water quality through, for example, minimizing the area of disturbance, limiting work to previously disturbed areas, or relocating or siting an installation to avoid sensitive natural resources. None of the management actions under consideration would substantially alter the water quality, nor would there be any changes to park management of water resources. Therefore, this topic was dismissed from further analysis.

Wetlands. The park contains numerous wetlands—including marshes, bogs, and vegetated lake and pond shores—that support considerable biodiversity. Wetlands contribute to the “natural” quality of wilderness character. The periodic maintenance of infrastructure such as boardwalks and bridges, which occurs as a regular part of park management, protects these resources and limits impacts to adjacent wetlands. Management actions under consideration in this EIS would not result in revised maintenance schedules or other park management actions that would have measurable effects on wetlands. Therefore, this topic was dismissed from further analysis.

Vegetation. Vegetation contributes to the “natural” quality of wilderness character. Drivers of vegetation dynamics include disturbances (natural and human-caused), climate, herbivory, and interspecific competition. Vegetation in wilderness areas of the park can be affected either directly through human trampling in off-trail areas or removal or thinning of trees to address hazards, or indirectly from erosion or introduction of contaminants in areas of frequent visitor use. Management actions under consideration in this EIS may result in minimal impacts to vegetation. Impacts to vegetation, to the extent that they are measurable, are discussed under impacts to wilderness character. Thinning and removal of trees to address hazards is addressed in an existing minimum requirements analysis (MRA). Therefore, this topic was dismissed from further analysis.

Terrestrial Wildlife. Management actions under consideration in this EIS do not pertain to the management of terrestrial wildlife, and actions considered would not result in significant impacts or issues for wildlife. Management activities proposed under the alternatives in this plan, including maintaining and preserving structures, creating new campsites or campgrounds, allowing specific uses, clearing vegetation, and managing trails may affect wildlife species by disturbing, displacing, or temporarily altering habitat or behavior. These impacts would be localized, affecting individuals but not affecting the species' populations or habitat overall, and would not lead to persistent changes in wildlife habitat. Changes in the winter closure of the park and potential effects to wildlife species are discussed in chapter 4 under "Wilderness Character" (the natural quality). Therefore, this topic was dismissed from further analysis.

Threatened and Endangered Species. The federal Endangered Species Act prohibits harm to any species of fauna or flora listed by the US Fish and Wildlife Service (USFWS) as being either threatened or endangered. Such harm includes not only direct injury or mortality, but also disturbing or destroying the habitat on which these species depend. More than 75 state-listed plant species are documented in the park. Among state-listed animal species occurring at the park are the moose, common loon, and osprey. Any changes in human activities resulting from management actions under consideration in this EIS would have no potential to adversely affect these species or their habitats. If a protected plant or animal species is identified during implementation of the plan, agency consultation and appropriate protection measures would be taken at that time.

Two federally listed endangered animal species, the northern long-eared bat and the gray wolf, are currently present in the park. The legal status of the gray wolf in the United States has changed many times, both on a federal and state basis. As of May 2023, the gray wolf continues to be protected under the Endangered Species Act throughout much of the United States (USFWS 2022). Specifically, gray wolves are listed as federally threatened in Minnesota and federally endangered in the remaining contiguous 48 states, except for gray wolves in the northern Rocky Mountain population (including wolves in Idaho, Montana, Wyoming, and parts of Oregon and Washington and north-central Utah), which are delisted and under state management (USFWS 2022). No actions being considered under this plan/EIS would directly impact wolves at the park. Any potential impacts from wolves and their management to wilderness are considered in the cumulative impact analysis, included in chapter 4 of the plan/EIS.

As of 2022, the northern long-eared bat is listed as endangered under the Endangered Species Act because of threats to the species from white-nose syndrome (USFWS 2023). The northern long-eared bat may inhabit houses or other structures and hibernate in caves and mines, swarming in surrounding wooded areas in autumn (USFWS 2023). Mine shafts at the park are not of the type and nature to support bat populations, which migrate off the island in winter. Implementation of potentially habitat-disturbing activities such as structure removal would avoid times when bats are present. The NPS consulted with USFWS to confirm that actions described in this plan/EIS would result in no adverse effects on the bat, and consultation will continue during the draft plan/EIS review period. A record of this consultation is provided in "Chapter 5: Consultation and Coordination." Therefore, this topic was dismissed from further analysis.

Archeological Resources, Ethnographic Resources, and Museum Collections. The park contains considerable evidence of both prehistoric and historic human habitation and use of Minong dating back more than 4,500 years. Recreation and management actions in the park can affect these cultural resources. However, the wilderness management actions analyzed in this EIS are not expected to impact these resources because the actions would not result in either physical changes to or redesignation of these resources. Archeological resources and ethnographic resources in the park's wilderness and nonwilderness areas are specifically addressed under the Cultural Resources Management Plan/Environmental Assessment (CRMP/EA). The CRMP/EA additionally addresses management of

traditional cultural properties (TCPs) that encompass the entirety of the park. The CRMP/EA proposes some management activities for these resources that could affect wilderness, but the NPS determined that impacts on wilderness character would be minimal and would be associated with the maintenance of fencing for visitor safety, hand clearing of vegetation, and archeological surveys and investigations. Activities for the management of archeological resources proposed under the CRMP/EA that have the potential to impact wilderness character, resources, or values would be subject to an MRA. Therefore, these resource topics were dismissed from further analysis.

Deterioration or removal of historic structures could adversely affect artifacts within historic structures in wilderness. Artifacts that are taken from historic structures in wilderness that fall within the park's scope of collection statement could become part of the park's museum collection. Therefore, any potential impacts are mitigated, and this issue was dismissed from further analysis.

Socioeconomics. Changes in fees charged to visitors to Isle Royale could negatively affect the number of visitors to the park and indirectly negatively affect gateway communities, as well as private businesses and organizations operating within the park. However, any proposed fees in the alternatives evaluated would be minimal. Given the expense of traveling to Isle Royale (which may include a ferry or seaplane to the island, as well as travel to Michigan's Upper Peninsula or Grand Marais or Grand Portage, Minnesota), the marginal additional expense is not sufficient to deter visitation to the park or result in a significant change in operating expenses for private businesses and organizations operating within the park. Additionally, any change in fee would follow a process independent of this plan/EIS that would include public notification. Therefore, this topic was dismissed from further analysis.

Environmental Justice. Presidential Executive Order 12898 requires federal agencies to identify and address disproportionate impacts of their programs, policies, and activities on minority and low-income populations. Executive Order 13045 requires federal actions and policies to identify and address disproportionately adverse risks to the health and safety of children. There are currently no permanent human settlements at the park. Although special use permits exist for the use of property on the island, the park is not otherwise publicly inhabited on a permanent basis. No management actions considered in this plan/EIS would affect existing special use permits to the use of historic island cottages, nor would the exercise of wilderness management at the park have a disproportionate effect on minorities, children, or those living at or below the poverty level in other areas outside the park. There would be no disproportionate impact to communities with potential environmental justice status. Therefore, this topic was dismissed from further analysis.

Treaties, Tribal Rights, and Sacred Sites. The NPS routinely consults with Tribes who have ongoing connections with Minong, and/or who have treaty rights on a government-to-government basis. No management action proposed as part of this plan//EIS would alter existing treaty rights or agreements between the NPS and Tribes. None of the management actions considered in this plan/EIS would alter the government-to-government relations between the Tribal Nations in the region and the NPS. Any actions taken to implement this plan will conform to existing laws and policies pertaining to treaty rights, trust responsibilities, and Tribal self-governance. Isle Royale is in the area covered by the 1842 Treaty of LaPointe and the subsequent 1844 Isle Royale compact.

In 2018, the island was designated as a Traditional Cultural Property (TCP) of the Grand Portage Band of Lake Superior Chippewa (Grand Portage Band). A TCP is a building, structure, object, site, or district listed in the National Register for its significance to a living community. It documents the community's cultural beliefs, customs, and/or practices associated with the place and the importance of the place in maintaining the community's cultural identity. The TCP listing celebrates both the historic and lasting relationship the Grand Portage Band has with Minong. The TCP covers the entire archipelago, all of Siskiwit Bay, and extends out a quarter mile from all peripheral islands. Members of the Grand Portage

Band have used these areas for centuries and maintain an active relationship with Minong, which was documented in the TCP nomination report through numerous interviews with Tribal elders and band members.

The Indian Self-Determination and Education Assistance Act of 1975 as amended by Public Law 103-413 (1994; the Tribal Self-Governance Act) and Public Law 116-180 (2020; the Progress Act), implemented Tribal self-governance in the NPS and other Department of the Interior (DOI) agencies. The Act provides Tribes participating in the self-governance program the authority to enter into annual funding agreements with NPS units for programs, activities, and services taking place within a park that would normally be conducted by the federal government. The Act also authorizes Tribes to develop these agreements with parks that are of cultural, historical, or geographic significance to the Tribe. The Grand Portage Band and Grand Portage National Monument (GRPO) developed their first agreement in 1999. Projects in the agreement include activities such as natural and cultural resources inventories; trail, campground and dock maintenance; construction; interpretation; art; and educational opportunities for Tribal youth.

The NPS continues to work closely with the Grand Portage Band on island matters and is strongly committed to building a more effective day-to-day working relationship reflecting respect for Tribal sovereignty. A co-stewardship agreement is expected in 2023, which will further promote collaboration on planning, research, interpretation, and historic preservation. This agreement would enhance the shared values and working relationships already in place between NPS and Grand Portage Band staff. Separately, the NPS recognizes the value and significance of traditional uses and traditional ecological knowledge, which were highlighted in the TCP nomination report. No management actions proposed in this plan would alter the TCP listing for Minong or existing or anticipated agreements with the Grand Portage Band; therefore, this topic is not discussed in detail in this plan/EIS.

Invasive Species. Nonnative plant species present a serious concern at the park. Approximately 700 species of vascular plants have been recorded within the park, of which slightly more than 100 are nonnative. Some examples of invasive species of concern that have been documented within the park include spotted knapweed (*Centaurea biebersteinii*), mountain bluet (*Centaurea montana*), creeping bellflower (*Campanula rapunculoides*) and garlic mustard (*Alliaria petiolata*). Spotted knapweed, in particular, has been found in several places in the park. Nonnative plant species can be introduced into wilderness at the park through natural transport vectors, such as wind, animals, and water. Transport can also result from human activities that import materials into the park. These materials may include equipment, soil, sand, gravel, food items, and clothing. Potential vectors for introduction of nonnative plant species into the wilderness include visitors and park personnel and their equipment. Seed adherence to boots, clothing, and equipment can also transport nonnative plant propagules into wilderness. Nonnative plant establishment is most noticeable in current and past natural and human-caused disturbed areas such as along trails, developed areas, camps, and riparian sites.

Park staff actively manage invasive plant species with manual treatments under the current Invasive Species Management Plan (NPS 2012). Activities to manage invasive species would not be affected by the new wilderness stewardship plan but are incorporated here by reference. The park actively inventories, maps, monitors for, and treats invasive exotics on an annual basis. The plan would not result in changes to these ongoing strategies for invasive species management. Therefore, this topic was dismissed from further analysis.

DRAFT PROGRAMMATIC MINIMUM REQUIREMENT ANALYSIS FOR HISTORIC STRUCTURES AND INSTALLATIONS IN THE ISLE ROYALE WILDERNESS

July 2023

1.0 STEP ONE

1.1 ISSUE STATEMENT

The National Park Service (NPS) is preparing an Environmental Impact Statement (EIS) in support of a Wilderness Stewardship Plan for Isle Royale National Park. Among the issues being addressed in the plan is the treatment of approximately 100 historic structures and installations in potential and designated wilderness.¹ All of these structures were present at the time of wilderness designation. Many of these structures are located in potential wilderness and remained in private use in accordance with life leases that were in place prior to wilderness designation.

The Park's General Management Plan (1998) evaluated but ultimately dismissed several alternatives that would have resulted in the removal of a significant number of historic structures from wilderness. The General Management Plan states "the greatest threat to cultural landscapes is neglect and attrition over time." Historic structures considered in this planning effort include all National Register of Historic Places (National Register) listed or eligible properties, as well as a few other structures that have reached the age of 50 years or older but have not been formally evaluated for National Register eligibility.

1.2 OPTIONS OUTSIDE OF WILDERNESS

Because these structures are located within the Isle Royale Wilderness or potential wilderness the NPS's decisions regarding the necessity and treatment of these structures are wilderness dependent as actions solely outside of wilderness cannot address this issue now or over time.

1.3 REQUIREMENTS OF FEDERAL LAWS

The **Wilderness Act** provides that there shall be no structure or installation within any designated wilderness "except as necessary to meet minimum requirements for the administration of the area for the purpose of [the] Act." Public Law 88-577; 16 U.S.C. § 1133(c). The Act requires the NPS to administer wilderness areas for such other purposes for which they may have been established as also to preserve their wilderness character and provides that wilderness areas "shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use." 16 U.S.C. § 1133(b). The Act also provides as follows:

¹ The NPS's Reference Manual 41 defines the term "structure" is anything made by humans that is intended for human occupation, or their possessions, and is left behind when the builder leaves the wilderness. An "installation" is anything made by humans that is not intended for human occupation and is left unattended or left behind when the installer leaves the wilderness. In this document, references to "structures" includes both structures and installations.

Nothing in this Act shall modify the statutory authority under which units of the national park system are created. Further, the designation of any area of any park, monument, or other unit of the national park system as a wilderness area pursuant to this Act shall in no manner lower the standards evolved for the use and preservation of such park, monument, or other unit of the national park system in accordance with the Act of August 25, 1916, the statutory authority under which the area was created, or any other Act of Congress which might pertain to or affect such area, including, but not limited to, the Act of June 8, 1906 (34 Stat. 225; 16 U.S.C. 432 et seq.); section 3(2) of the Federal Power Act (16 U.S.C. 796 (2)); and the Act of August 21, 1935 (49 Stat. 666; 16 U.S.C. 461 et seq.).

Public Law 88-577, § 4(a)(3).

The **National Park Service Organic Act of 1916** requires the NPS to “promote and regulate the use of the National Park System by means and measures that conform to the fundamental purpose of the System units, which purpose is to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.” 54 U.S.C. § 100101(a). Section 1.4.7 of the NPS’s 2006 Management Policies directs park managers to avoid unacceptable impacts that could lead to impairment of park resources. Relevant here, unacceptable impacts are impacts that, either individually or cumulatively, “be inconsistent with a park’s purposes or values,” “impede the attainment of a park’s desired future conditions for natural and cultural resources as identified through the park’s planning process,” “diminish opportunities for current or future generations to enjoy, learn about, or be inspired by park resources or values,” or “unreasonably interfere with... the atmosphere of peace and tranquility, or the natural soundscape maintained in wilderness and natural, historic, or commemorative locations within the park.”

The **National Historic Preservation Act** requires the NPS to establish a preservation program for the identification, evaluation, and nomination to the National Register, and protection, of historic property. The preservation program established must ensure that, among other things, “historic property under the jurisdiction or control of the agency is identified, evaluated, and nominated to the National Register [of Historic Places]” and that historic property under the NPS’s jurisdiction or control “is managed and maintained in a way that considers the preservation of their historic, archeological, architectural, and cultural values ... and gives special consideration to the preservation of those values in the case of property designated as having national significance...” 54 U.S.C. § 306102.

1.4 VALID EXISTING RIGHTS

When the government acquired inholdings within the park, life leases were employed as a device to gain title to a property at little or no cost to the government. Under a life lease, full or part time island occupants and their minor children were permitted to occupy their former residence on the island for the remainder of their lives. At the time of wilderness designation areas where life leases were still in place were designated as potential wilderness additions. All life leases have now expired.

In 1977, the intent of the original grantors related to minor children of lessees was further interpreted at a national policy level to allow the continued occupancy of minor children alive at

the time the original recreational leases were signed through the issuance of a special use permit. Consistent with that determination, current special use permits provide for seasonal occupancy of four former life lease properties (Anderson, Connolly, Mattson, McPherrin) in potential wilderness areas. Those special use permits will remain available on an annual basis for the remainder of the permittee’s lives.

1.5 SPECIAL REQUIREMENTS OF WILDERNESS LEGISLATION

Public Law 94-567 (Oct. 20, 1976) designated 131,880 acres of Isle Royale National Park as wilderness and 231 acres as potential wilderness. Historic structures within designated and potential wilderness were not identified in this legislation. Many of the historic structures considered in this MRA were not historic at that time but have since become historic.

1.6 IDENTIFICATION OF STRUCTURES THAT CONTRIBUTE TO WILDERNESS CHARACTER

Through the wilderness stewardship planning process, the NPS identified the structures in wilderness and evaluated whether they contribute to the wilderness character of the Isle Royale Wilderness. In particular, the NPS consulted the Park’s General Management Plan, Foundation Document, the State of Michigan survey of historic buildings (1975), and the development of the Isle Royale narrative history (1988), which included a listing of possible national register nominations. In addition, the NPS List of Classified Structures program began documenting historic structures at Isle Royale National Park in 1995. This effort culminated in the Franks and Alanen study, Historic Structures at Isle Royale (1999), the most comprehensive listing which also made National Register eligibility recommendations. This study was reviewed by the State Historic Preservation Officer and determinations were made as to whether structures were eligible for listing on the National Register. The three fire towers considered in this document were added to the Isle Royale National Park Fire Towers multiple property submission through Supplementary Listing Records to the National Register (2021).

Based on these evaluations, approximately 100 historic structures that contribute to wilderness character were identified and considered in this planning effort. Those structures are organized according to location and identified in Table 1 below.

Table 1. Historic Structures within Designated and Potential Wilderness.

| Tobin Harbor Historic District | | |
|---------------------------------------|---|------------------|
| Location | Camp Structures/Installations or Colloquial Name | |
| Beard Camp | Cottage | Storage Building |
| Edwards Camp | Cabin | Dining Room |
| | Store House and Outdoor Kitchen | Privy |
| | Gem Island Cabin | |
| Connolly Camp | Cabin | Guest House |
| | Privy | |
| Dassler Camp | Cottage | Guest House |
| | Privy | Boat House |
| Gale Camp | Cottage | Guest Cottage |
| | Privy | Tool Shed |
| How Camp | Cabin | Guest Cabin |
| Kemmer Camp | Guest Cabin | Boat House |

| Tobin Harbor Historic District | | |
|--|---|--|
| Location | Camp Structures/Installations or Colloquial Name | |
| | Residence | Privy |
| | Steps | Store House |
| Mattson Fishery Camp | Cottage | Fishing Shed |
| | Privy | Storage Building |
| | Fish House | Net House |
| | Fishery Cabin | |
| Merritt Camp | Cottage | The Parsonage |
| | Deer House | Moose Manor |
| | Privy | Woodshed |
| Minong Island Lodge | Post Office | Cabin |
| Siefert Camp | Cottage | Privy |
| | Storage Building | |
| Snell Camp | Cottage | Guest House |
| | Store House | Writing Shack |
| Stack Camp | Cottage | Guest Cottage |
| | West Privy | Retaining Wall |
| Fisherman's Home Cultural Landscape | | |
| Main Residence | Fish House | Store Room |
| Help Quarters #1 | Help Quarters #2 | Privy |
| Dry-Laid Stone Wall | Tool Shed | Smoker |
| Guest Cabin | Net House | |
| Crystal Cove Cultural Landscape | | |
| Main Lodge | Guest Cabin #1 | Guest Cabin #2 |
| Residence | Boardwalk | Fuel Shed Ruin |
| Generator House | Smokehouse | Storage Shed |
| Captain Kidd Cultural Landscape | | |
| McPherrren Cabin | Bath House | Boat House |
| Flagpole | Sleeping Cabin #1 | Sleeping Cabin #2 |
| Tool Shed | Sleeping Cabin #3 | |
| Wright Island Area | | |
| Main Cabin | Mike Johnson Cabin | Privy |
| Bangsund Fishery | | |
| Main Residence | Sleeping Cabin #1 | Sleeping Cabin #2 |
| Johnson-Anderson Fishery | | |
| Main Cottage and Log Sleeping Area | Privy | Herman Johnson Cottage |
| John Anderson Cottage | | |
| Other Areas | | |
| Davidson House | Island Mine Powder House Ruin and Hoist Engine | Holger Johnson Fishery and Resort |
| Horner Cottage | Johns Cabin | West Caribou Island Foghorn Compressor Shack and associated historic installations |
| Anderson and Scotland Residence | | |
| Fire Towers | | |
| Ishpeming | Mt. Ojibway | Feldtmann |

1.7 DRAFT DETERMINATION OF CONTRIBUTING STRUCTURES NECESSARY TO PRESERVE THE HISTORIC VALUES OF THE ISLE ROYALE WILDERNESS

Wilderness designation does not diminish the NPS's fundamental responsibility for affirmatively managing its cultural resources. The Wilderness Act's provisions do not lower the standards for the use or preservation of national parks under the various laws applicable to that national park including, the NPS Organic Act of 1916, the Antiquities Act of 1906, the Historic Sites Act of 1935, the National Historic Preservation Act of 1966, and other federal legislation that applies to the protection of cultural resources. Section 6.3.8 of the Management Policies states that "cultural resources that have been included within wilderness will be protected and maintained according to the pertinent laws and policies governing cultural resources using management methods that are consistent with the preservation of wilderness character and values." Managing to preserve wilderness character requires managers to holistically consider the five tangible qualities of wilderness character, all equally important, which are: (1) Natural, (2) Untrammelled, (3) Undeveloped, (4) Outstanding Opportunities for Solitude or Primitive and Unconfined Recreation, and (5) Other Features of Value.

The "other features of value" quality of wilderness character is rooted in the Wilderness Act, which provides that wilderness "may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value" (emphasis added). This quality also ties to one of the six public purposes of the Wilderness Act "historical use." This quality is important because it protects features unique and integral to an individual wilderness that might not be identified with one of the other four qualities.

Historic structures, even those that contribute to wilderness character, are prohibited under section 4(c) of the Wilderness Act unless they are "necessary to meet the minimum requirements for the administration of the area for the purpose of this Act." Because the NPS has an obligation to preserve wilderness character, a structure meets this necessity standard and may be retained in wilderness if its existence preserves the totality of wilderness character based on a careful balancing of the five qualities of wilderness character. Thus, the NPS evaluated the approximately 100 historic structures (identified above) that were found to contribute to the wilderness character of the Isle Royale Wilderness to determine whether these structures were necessary either individually, or as components of a historic district, to preserve the historic values of the Isle Royale Wilderness.

In general, in evaluating the necessity of historic structures in the Isle Royale Wilderness, the NPS assessed its contribution to the "other features of value" quality of wilderness character, considering the following elements:

- Historic significance: whether the structure is listed or eligible for listing on the National Register of Historic Places, or is identified as a contributing resource to a larger historic district, and the level of significance at which the structure or district is eligible or listed.
- Historic integrity and uniqueness: the structure's historic integrity, generally defined as how well a structure conveys its historical significance; the structure's condition; the structure's uniqueness and architectural features; and whether there are any other similar structures within the park.
- Historic value: how the structure relates to the park's purpose and significance as described in park-specific enabling legislation or wilderness legislation and

accompanying legislative history; how the structure relates to the park's fundamental resources and values identified in a park's Foundation Document (which identifies precontact and historic mining sites, shipwrecks, folk and commercial fisheries, vernacular boats, lighthouses, and ethnographic use and resource as fundamental resources and values of the park)²; and, its relationship to the history and stories of people and their life on the island or historic events that led to the creation of the park or preservation of its wilderness.

In addition, the NPS considered the impacts of the structure, or related group of structures, to the other four qualities of wilderness character, including: their visual prominence and congruence with natural surroundings (solitude quality); their size, character and proximity to other structures (undeveloped quality); impact to plants, animals, air quality, and water quality (natural quality); and impacts to the biophysical environment (untrammelled quality).

Many structures that were once located in the Isle Royale Wilderness have already been removed from wilderness or destroyed following federal purchase. The remaining historic structures are generally of small scale compared to the extended island and its immense Lake Superior boundary. They are subtle and fit lightly into the landscape compared to more modern, industrial, and mechanized intrusions or larger or more complete structures and complexes. Often the boundaries between areas of cultural use and undisturbed wilderness are blurred or not apparent to most observers. Even where many of the resources have deteriorated through time, these resources provide important educational opportunities for reflection upon life cycles, the fleeting nature of visible human intervention in wild lands, and the robust ability of nature to rewild itself. Select cultural resources, such as the ancient and small-scale copper mining pits on the Minong Ridge and small-scale historic sites such as Long Point, exemplify the historical values of wilderness resources.

At Isle Royale, the undeveloped quality is degraded by the presence of installations and structures in designated wilderness. The presence of numerous recreational cabins and other structures in potential wilderness, fire towers in wilderness, and other such installations that are essentially unavoidable when traveling around the islands, may negatively impact opportunities for solitude. Many of the recreational camps are concentrated into small, but often visited areas of the island, and visitor encounters are frequent in these locations.

The solitude quality of wilderness may also be degraded when a visitor, seeking solitude, encounters a structure within the wilderness, or when a structure is visible within wilderness.

The natural quality of wilderness is preserved when wilderness ecological systems are substantially free from the effects of modern civilization. The presence of structures on Isle Royale diminishes the ecological systems in the areas where structures are located. The construction of structures, especially since they are generally present in clusters or camps that consist of small buildings, resulted in removal of vegetation, such as for clearing footpaths and for fire protection, and soil disturbance such as compaction. However, the continued presence of

² Fundamental resources and values (FRVs) are those features, systems, processes, experiences, stories, scenes, sounds, smells, or other attributes determined to warrant primary consideration during planning and management processes because they are essential to achieving the purpose of the park and maintaining its significance. Fundamental resources and values are closely related to a park's legislative purpose and are more specific than the park's purpose statement.

structures themselves does not manipulate the environment nor does it preclude the natural ecosystems on the island from functioning naturally. Therefore, any impact from the presence of the structures to the natural quality of wilderness is minimal.

Structures may degrade the **untrammelled quality** of wilderness if they deliberately manipulate the biophysical environment. None of the approximately 100 structures evaluated in this MRA represent an ongoing trammel to Isle Royale's wilderness.

The Foundation Document for Isle Royale states that resources associated with maritime character and fishing culture are park fundamental resources. The Foundation Document notes that properties built in the late 1800s and early 1900s that are listed or eligible for listing in the National Register are other important resources and values of the park. These properties include lodges, resorts, and summer cabins that fostered the growth of tourism on Isle Royale and helped give rise to the idea of establishing the archipelago as a national park. Interpretive themes described in the Foundation Document note that "despite changing human values and cultures, the allure of Isle Royale's primeval character has been consistent through time."

The **other features of value quality** of Isle Royale's wilderness character is diminished by the loss of cultural resources of value. In general, this quality may be degraded by the loss or removal of historic structures, the illegal removal of cultural artifacts, and damage or vandalism to historic structures. Other threats include loss of traditional knowledge and understanding of life on the island, including ethnographic resources as they relate to the island and knowledge of endemic, island-specific vernacular boat design.

Historic structures in Isle Royale wilderness are either individually assessed or assessed as an interrelated group of structures below.

1.7.1 Tobin Harbor Historic District

Tobin Harbor is located at the northeast end of Isle Royale. The Tobin Harbor Historic District is located at the northern end of the narrow harbor and contains a collection of structures and installations, and landscape features associated with a commercial fishery, a tourist resort, and 14 seasonal camps. The families that built these features came to Isle Royale to engage in recreational activities including boating, fishing, hiking and picnicking all of which remain appropriate recreational uses in Isle Royale's wilderness or in the adjacent nonwilderness Lake Superior waters. The District includes 1 contributing site and 52 contributing buildings.

Tobin Harbor's buildings are characterized by their vernacular architecture keeping with the rugged, wilderness character of Isle Royale. The buildings feature simple designs and construction methods necessitated by the remote location of Isle Royale and its rugged landscape. Many were built by local craftsman, while some were built by the summer residents themselves. Their simplicity, including small size and building material, reflects the difficulty in constructing, and then maintaining, a building when materials had to be transported long distances across the water and craftsman were not always available. All of the structures in the District are small, with the largest not even measuring 30' by 30'. Nearly all are made from dimensional lumber and many from wood or materials that were repurposed from other structures on the island. The majority of the remaining structures have had little alteration since their initial construction, including their interior spaces, which remain remarkably similar to the original condition. Nonetheless, there has always been significant variation among the camps,

and each camp retains its own unique architectural character. Most camps were expanded over the years to include an enclave of small buildings, which often consisted of the main cottage, guest cabin, tool shed, privy, and sometimes a boathouse.

At the time of the park's establishment, no less than 158 structures were present in Tobin Harbor. Many of these were associated with the Minong Lodge (ca. 35 buildings), but others related to 10 summer camps that were eventually removed following park purchase. Those removed include the Langley, Smith, Musselman, Savage, Emerson, Newman, Carlson, Hart, Wheelock, and Bailey Camps. Although portions of the Mattson/Anderson Fishery remain extant, the majority of the fishery's structural footprint has been disassembled. Although more than half of Tobin Harbor's original inventory of summer camps have been removed, a review of the remaining camps determined that they create a network of properties that reinforces their historic association. The absence of the ten summer camps makes the remaining camps even more integral to maintain the historic integrity of the District.

Tobin Harbor's remaining camps feature multiple rustic structures, and landscape features organized into clusters. The clustering of the camps is a distinctive feature of these types of communities. Families built their camps within view of other families to recreate with each other. The buildings reside within the natural wilderness landscape, with minimal manipulation of the land and without formal landscape features that are more typical of an urban setting. The camps were purposely constructed far enough away to retain a rustic, natural setting, but close enough that families could recreate together. The Historic District is significant in part as a superb example of how families in the early nineteenth centuries lived and recreated together.

Many families, when first arriving at Tobin Harbor, would spend their summer in tents. Often they would build a primary cottage and then would follow with other supporting structures necessary to support the families, including privies and store houses to protect food from the naturally unforgiving elements on the island. Because the structures were so small, some families added guest houses or other sleeping structures to accommodate their growing families or for friends. In some cases, guests that visited some of the original families then purchased land and built their own camps, often within view of their friends' camp.

In 2019, the Tobin Harbor Historic District (District) was listed in the National Register at the national level of significance. See National Register Nomination Form, Tobin Harbor Historic District. Tobin Harbor effectively represents a late nineteenth and early twentieth century recreation district with an exceptional level of integrity and authenticity and is a rare surviving example of the property type. The Tobin Harbor Historic District is one of the only surviving examples of a recreational enclave in the North Woods region of Minnesota, Wisconsin, and Michigan. While similar recreational districts exist from a similar time period, those have experienced incremental changes into the modern era, which resulted in a gradual loss of integrity. Tobin Harbor is distinct for its high level of historic authenticity. With the establishment of Isle Royale National Park, not only were the wilderness qualities protected, but change was arrested in Tobin Harbor, and arrested during the historic period. In part, because electrical service and modern plumbing were never introduced, Tobin Harbor is a virtual time capsule from the first decades of the twentieth century. As a result, the Tobin Harbor Historic District is not only an important representation of the emergence and evolution of tourism in the North Woods region, but its vernacular landscape and architecture, and remarkably original interior spaces, provide exceptional insight into life in a seasonal community in a remote, wilderness setting. While there are other examples of late nineteenth and early twentieth century

rustic, wilderness-like recreational communities elsewhere in the United States, Tobin Harbor is nationally significant because it remains one of the only high integrity examples of this type of recreational enclave. It provides one of the only high integrity examples of the distinct regional recreational communities with the national pattern of travel and recreational history in the United States that developed during the late nineteenth and early twentieth centuries.

1.7.1.1 Beard Camp

The Beard Camp is located on Island #12, on the northern shore of Tobin Harbor. The camp includes three contributing buildings, a cottage, a guest house, and a privy. A flagpole is considered a contributing structure. Only submerged remnants of the dock remain, although there is a concrete slab on the west end of the island that was associated with the dock. There are also several stone steps on the north side of the island leading down to the lake and rustic chairs and benches within the camp. The Beard Camp included a storage building which was determined not to contribute to the Tobin Harbor Historic District.



Beard Cottage

Built in 1917, the Beard cottage measures 24' by 20' and features clapboard siding, corner boards, picket skirting, and a gable roof with asphalt rolled roofing. There is an 18' by 8' shed-roofed section at the rear that contains the kitchen and a covered porch. There is also a 6' by 8' front porch centered on the south elevation that is covered with a shed roof. Eight steps descend from the porch toward the lake. The cottage is painted light green with dark green trim.

The guest cabin is located just to the west of the cottage and was built in about 1928. The building measures 11' by 9' and features vertical log construction. The building is covered with a gable roof with asphalt rolled roofing. A log door is centered in the east gable end. A single window covered by a canopy is centered in the west gable end. The building is unpainted. In 1953, the guest cabin was moved a short distance from a hillside to its current location on a level area.

Beard Camp and its associated structures have a limited visual impact within wilderness because the structures are small and much of this camp is enclosed by trees. The cottage is visible by boat from the northeast, which is not in wilderness and this visibility is also limited due to the trees that enclose much of the camp. It is unlikely that wilderness visitors would notice the camp, or its associated structures unless the visitor was visiting Tobin Harbor and seeking out the camp. Beard Camp and its associated structures and features detract from the undeveloped and solitude qualities of wilderness, while vegetation has built up around these structures making them less visible, the Beard Camp is visible to and from other camps in the immediate vicinity. While this detracts from the opportunity for solitude, the fact that the camps are visible to each other is relevant to the historical context of the District as a whole. The camps were purposely constructed far enough away to retain a rustic, natural setting, but close enough that families could recreate together. The previous removal of the Smith and Newman Camps on adjacent islands further isolates the Beard Camp thus enhancing its natural setting and reduced the impacts of camps in this area on the undeveloped quality of wilderness. The District is significant in part as a superb example of how families in the early nineteenth centuries lived and recreated together. Therefore, while the Beard Camp's proximity to other camps detracts from

the opportunity for solitude, it enhances the fifth quality of wilderness as the placement of recreational camps in Tobin Harbor is relevant to their historic purpose.

The structures themselves contribute to the fifth quality of wilderness character—other features of value. The cottage, guest house, and privy retain their integrity and contribute to the significance of the Tobin Harbor District as a recreational community within wilderness. The Beards traveled from Omaha, Nebraska to Isle Royale each year to spend their summer in the wilderness with friends. In 1931, some Isle Royale residents founded the Isle Royale Protective Association in order to advocate for the protection of Isle Royale’s fisheries and lands and ultimately advocate for the protection of the island as a National Park. Henry Beard served in a leadership position in this group. Because the cottage itself was small, the guest house was necessary for the owner’s children. The small-scale features including the flagpole, stone steps, and rustic benches reflect the activities that took place at the camp. While these features detract from the undeveloped quality of wilderness character, they enhance the integrity of feeling and association with the camp as they have been present since the camp’s establishment and have not been altered over time. These features, together with the cottage, guest house, and privy, demonstrate how the Beard family lived within wilderness including the utilization of the natural features around them.

Conclusion: Tobin Harbor Historic District, and the remaining camps within the District, are necessary to convey the historic values of Isle Royale’s wilderness. The Beard cottage, guest cabin, privy, and flagpole collectively comprise the Beard Camp and contribute to the significance of the District as a whole. The Beard family’s contribution to the designation as a national park, while living on the island in the cottage and guest cabin, contributes to the historic values of Isle Royale’s wilderness. The cottage and guest cabin are in good condition and retain high historic integrity. The camp’s placement in vicinity to other camps contributes to an understanding of how the families lived together in Tobin Harbor and are necessary for a continued understanding of how these families lived together in wilderness. While the privy does contribute to the integrity of the camp and the Historic District, the privy is not necessary to convey the historic values of wilderness. The privy is in poor condition. Other privies within Tobin Harbor remain, are in working condition, and can convey a similar story. Therefore, Beard privy is not necessary to convey the historic values of the Isle Royale Wilderness.

1.7.1.2 Edwards Camp (Prospect Camp)

Known as Prospect Camp, the camp’s buildings are located atop a steep cliff near the west end of Edwards Island. A trail traverses the hillside to reach the camp. Edwards Island contains four contributing buildings, the cottage, a dining pavilion, a store house and outdoor kitchen, and a privy. The cabin on Gem Island is also a contributing building. Prospect Camp represents a particularly cohesive collection of buildings and the designs for the dining pavilion and outdoor kitchen are unique among the buildings constructed in Tobin Harbor.

The cottage was constructed in 1912. The open-sided dining pavilion, measuring 10’3” by 12’, was built in 1921 and is located to the west of the main cottage. The cottage is one of only three structures in Tobin Harbor with a stone fireplace. The privy is located to the east of the main cottage. It measures 5’3” by 4’3” and remains operational. The store house, which provided space for kitchen utensils and food storage, was built in 1921. It is located immediately to the south of the dining pavilion. The caption describes the building as “The New Kitchen.” An

“outdoor kitchen,” which is essentially an open porch, was added by 1924. The overall building measures 18’6” by 10’. The original camp included a boat house and dock which are no longer present aside from their submerged remnants.

Built in 1938, the Gem Island Cabin is a small, one-story building containing a single room. The rectangular building measures 15’2” by 10’. The cabin’s most unique design element becomes apparent from the interior; namely, the gable roof features an off-center ridge with an uneven slope.

As a result, the east slope of the roof extends to a lower point along the wall, creating a somewhat more intimate space along that side of the cabin. This cabin is a relative latecomer to the Tobin Harbor Historic District. Its 1938 construction was initiated at the tail end of purchase negotiations with the federal government. Life leases were only allowed at improved properties. To ensure extended family use of Gem Island, the cabin was built in the final months before a purchase agreement was struck with the Edwards family.



Edwards Camp Dining Pavilion

The Edwards Camp is within view outside wilderness when entering this removed section of Tobin Harbor by boat from the northeast or southwest. However, the structures within the camp are less visible from within wilderness. A number of camps within Tobin Harbor Historic District have views of Edwards Island and Gem Island, but the buildings themselves, including the cottage, cannot be seen because of their exact placement and the vegetation that surrounds the camp. Should wilderness visitors decide to explore Edwards Island, they might encounter the camp which might detract from their opportunity for solitude. However, a wilderness visitor would be unlikely to notice these structures unless they are hiking within the immediate vicinity of the camp. Therefore, while the structures do detract from the opportunity for solitude in wilderness, those impacts are limited within wilderness because much of the camp is not visible unless you are very close or within the camp.

The structures in the camp also detract from the undeveloped quality of wilderness. The Edwards Camp is one of the larger camps in Tobin Harbor. The size of the camp detracts from the undeveloped quality of wilderness more than others. However, as discussed above, while the footprint of this camp is larger than some, the relatively isolated location and surrounding vegetation of the camp make it unnoticeable unless you are within or near the camp. The Gem Island Cabin is virtually invisible to those passing by in watercraft (outside of wilderness) or when viewed from adjacent wilderness. This is due to surrounding vegetation along with subtle profile of the small cabin.

The Edwards Camp contributes to the fifth quality of wilderness character because of the family’s contribution to the national park designation and to a long-term scientific study within the park, because of the unique aspects of several of the buildings within the camp, and because the camp contributes to the designation of Tobin Harbor as a nationally significant historic district. The Edwards were an early founding family of the Tobin Harbor Historic District and served in a leadership role of the Isle Royale Protective Association (IRPA) and contributed to the establishment of the park. Maurice Edwards drafted the resolution to designate Isle Royale for federal protection. The cottage is the primary structure associated with the camp and was the central meeting location in the camp. This structure has been used for biological research for many years, which contributes to the rich history of research on Isle Royale.

Several of the structures in the Edwards Camp are unique within Tobin Harbor and within the region. The outdoor kitchen and open-sided dining pavilion associated with the camp is distinctive to Tobin Harbor and may reflect the Progressive Era ideas about the healthy aspects of outdoor living. There are few similar examples in the region, especially with such high integrity. These structures may have been designed with professional assistance, which was also unusual within the structures in the District. The store house, privy, and Gem Island Cabin do not necessarily include special or unusual features, but the presence of these structures demonstrate how the Edwards family lived in the natural, wilderness setting. Therefore, while this camp detracts from the undeveloped quality more than some other camps, it contributes greatly to the fifth quality of wilderness character.

Conclusion: Tobin Harbor Historic District, and the remaining camps within the District, are necessary to convey the historic values of Isle Royale's wilderness. The Edwards cottage, dining pavilion, store house and outdoor kitchen, privy, and Gem Island Cabin collectively make up the Edwards Camp and contribute to the significance of the District as a whole. All of the structures at Edwards Camp have high historic integrity. The camp's unique outdoor kitchen and dining pavilion contribute to wilderness character not only for their historic uniqueness but also for their purpose – the family desired to move one of the most basic aspects of living outdoors. Because of the uniqueness of these structures and their purpose, these structures are necessary for conveying Isle Royale's wilderness values. The use of the cottage for research purposes is also unusual and serves as a necessary connection between the island and its importance to scientific study, which is a wilderness value and fundamental value of the park. The remaining buildings, the store house, privy and Gem Island Cabin, while they do not include a significant architectural feature, they are necessary to convey the cohesive and related nature of the buildings on the landscape. They are also necessary to understand how the family lived in the camp in wilderness. Because these structures retain high integrity, collectively demonstrate how the family lived in the camp, and because the camp and these structures contribute to the District, all of the remaining structures in the camp are necessary to convey the historic values of the Isle Royale Wilderness.

1.7.1.3 Connolly Camp (Cliff Crest)

Known as Cliff Crest, the Connolly Camp is on a .3246 acre parcel of land that includes 140' of lakeshore along Tobin Harbor. The lot is 101' deep. A trail from the Dassler boathouse leads past the guest house and up a steep hill with stone steps and a rustic railing to the cottage. The camp includes three buildings that have been found to be contributing to the Tobin Island Historic District: a cottage, a guest cabin, and a privy.

The Connolly cottage features the most dramatic setting of any building in Tobin Harbor. Built in 1914, the cottage is perched on the edge of a rock-faced cliff with expansive views to the north and east. The cottage, including the front porch, measures 24' by 20'2" and features drop-lap siding, corner boards, and a gable roof covered with asphalt rolled roofing. The roof extends over the front porch, which runs the length of the north elevation. An addition off the rear elevation is covered with a shed roof. A screened porch along the west side of the addition was added sometime after 1935. Together, the rear additions measure 17'1" by 8'. The building body is painted green with white trim.



Connolly Cottage

The guest house is located near the shore, just to the east of the Dassler boat house. Built in about 1916, the cabin measures about 9' by 9' and features drop-lap siding, corner boards, and a gable roof covered with asphalt rolled roofing. Each of the remaining three walls features one six-light casement window. The cabin is painted dark green. The guest cabin is in fair condition and the roof is deteriorating.

Built by about 1950, the privy features drop-lap siding, corner boards, and a shed roof covered with asphalt rolled roofing. The privy measure 4' 8" wide by 5' 8" long and is approximately 7' tall. The door contains a small window. The privy is painted dark green but the paint is almost completely worn off the building.

The main cottage is perhaps one of the most visible structures within Tobin Harbor due to its prominent location on top of a cliff at the mouth of Tobin Harbor proper. The Connolly cottage is quite visible from the water, which is non-wilderness, and from adjacent wilderness islands in the vicinity. The Stack/Wolbrink and Beard Camps are visible from the camp. The camp is connected to the Dassler and Siefert Camps by a series of trails. While the cottage, guest cabin and privy all detract from the opportunity for solitude in wilderness and the undeveloped quality of wilderness, the fact that the camps are visible to each other is relevant to the historical context of the Historic District as a whole. The camps were purposely constructed far enough away to retain a rustic, natural setting, but close enough that families could recreate together. The Historic District is significant in part as a superb example of how families in the early nineteenth centuries lived and recreated together. In this case, the Dassler Camp and Connolly Camp are nearly intertwined, as the families spent considerable time together. Therefore, while the Connolly Camp's view of other camps detracts from the opportunity for solitude, it enhances the fifth quality of wilderness as the placement of recreational camps in Tobin Harbor is relevant to their historic purpose.

The main cottage and other structures enhance the fifth quality of wilderness character—other features of value. Like many other families in Tobin Harbor, the Connolly family significantly contributed to the designation of Isle Royale as a national park and to the long history of recreational use of Tobin Harbor by associated families. The structures, as described above, contribute to the significance of the Tobin Harbor Historic District which contributes to the fifth quality of wilderness.

Conclusion: Tobin Harbor Historic District, and the remaining camps within the District, are necessary to convey the historic values of Isle Royale's wilderness. The Connolly cabin, guest

house and privy collectively comprise the Connolly Camp and contribute to the significance of the District as a whole. These remaining structures at Connolly Camp have high historic integrity and are in good condition. The camp's placement in vicinity to other camps contributes to an understanding of how the families lived together in Tobin Harbor and are necessary for a continued understanding of how families from that time period lived together in wilderness. Thus, the cabin, guest house, and privy are necessary to preserve the historic values of the Isle Royale Wilderness.

1.7.1.4 Dassler Camp

The Dassler Camp sits on 2.2 acres on a high bluff on the northeast end of the main island. Some of the most impressive views of the Tobin Harbor area can be viewed from this camp. The Dassler Camp contains four contributing buildings to the Tobin Harbor Historic District including a cottage, a sleeping cabin, a historic privy, and a boathouse. The associated dock is outside of wilderness but is also considered a contributing structure to the District. There is one non-contributing building, a modern privy built by the NPS ca. 1990. This privy is not historic and its necessity will be determined through a separate programmatic MRA.



Dassler Cottage

The Dassler cottage is a one-story, three-room building measuring 23' by 15'4" with an associated lean-to and open porch. It is one of three cottages with a stone fireplace. The cottage still contains some original furniture. The sleeping cabin is a one-story rectangular building measuring 16'4" by 12'2". It is located on a hillside from which one can see some of the most dramatic views in the park, including panoramic views beyond the harbor toward Lake Superior. At times, the view includes powerful waves crashing at the base of the point. The associated privy was built in the late 1940s. The boathouse, which is often mistaken to belong to the Connolly Camp because of its close proximity, measures

20' by 10'4 and is a one-story frame building. It is located completely on land unlike most of the early Tobin Harbor boathouses that were built over the water. The camp includes the second most extensive set of stone steps in the District. The site has been well maintained and the cottage and sleeping cabins remain in use for administrative purposes along with the non-historic privy. The structures in the Dassler Camp detract from the opportunity for solitude and from the undeveloped quality of wilderness. The sleeping cabin structure is highly visible from the water (non-wilderness) and within wilderness, specifically Scoville Point, which is the terminus of popular hike from Rock Harbor. Rock Harbor is one of the most well visited locations in the park and the trail leading to Scoville Point is highly trafficked. Therefore, it is likely that many visitors enter Isle Royale's wilderness from Rock Harbor on this trail and that the noticeable presence of the structure somewhat diminishes the opportunity for these visitors to experience solitude. However, the other structures including the cottage, are relatively subtle and are only noticeable to wilderness visitors within camp.

The Dassler Camp contributes to the fifth quality of wilderness character—other features of value. The Dassler family was one of the earliest to come to the park. A historic photograph of the Dassler family camping in the cove at Scoville Point, within sight of where they would eventually build their camp, presents an iconic image of the wilderness camping experience at

the turn of the twentieth century and is representative of how those that followed the Dasslers settled on the landscape. Judge Charles Dassler contributed significantly to the District as a founding member of the Tobin Harbor community, selling parcels of land to encourage others to come to the island. Dassler also was active in the IRPA and contributed to the establishment of the park. Thus, the Dassler Camp retains historic value for its relationship to the history and stories of people and their life on the island or historic events that led to the creation of the park. Additionally, all the contributing structures within the camp are of high historic integrity and some of the structures include features that are uncommon elsewhere in Tobin Harbor, e.g., stone fireplace, boathouse over-land location and the spectacular views. The cabin was sited where it was for its commanding views of the open lake, and these views contribute to its historic significance and integrity. The structures in the camp, as described above, contribute to the significance of the Tobin Harbor Historic District which contributes to the fifth quality of wilderness.

Conclusion: The Tobin Harbor Historic District, and the remaining camps within the District, are necessary to convey the historic values of Isle Royale's wilderness. The Dassler cottage, sleeping cabin, historic privy, and boathouse collectively comprise the Dassler Camp and contribute to the significance of the District as a whole. The Dassler family's contribution to Isle Royale as a national park, their contribution to the development of Tobin Harbor as a recreational destination collectively contribute to the historic values of Isle Royale's wilderness. The contributing structures are in good condition and retain high historic integrity. The camp's placement in vicinity to other camps contributes to an understanding of how the families lived together in Tobin Harbor and this aspect of its significance is tied to the landscape in which it is sited. For example, the Dassler, Connolly, and Siefert Camps are all connected to one another through a small network of trails. Similarly, the superb views from the camp, which contribute to its significance, are tied to the landscape in which it is sited. Thus, the Dassler cottage, sleeping cabin, historic privy, and boathouse are necessary to preserve the historic values of the Isle Royale Wilderness.

1.7.1.5 Gale Camp

The Gale Camp is on a 1.81 acre island, a short distance from How's Island. Trails lead from the docks on the north and south sides of the island to the camp's buildings. The trail on the north side includes several stone steps. An open-sided wood storage rack that has been rebuilt with salvaged materials is considered a landscape feature. There are three contributing structures in the camp: a cottage, a guest cabin, and the tool shed and privy. There is a second non-contributing privy that was constructed outside the period of significance and its necessity will be determined in a separate MRA. The two docks are considered contributing structures but are outside of wilderness.

The Gale Cottage is one of the larger cottages in Tobin Harbor. The cottage is a one-story rectangular building measuring 35' by 26' and features simulated log siding of varying widths, and a gable roof with asphalt shingles. The guest cabin is located along the north side of the island, perched just above the water. Constructed in about 1952-53, the cabin is a rectangular building measuring about 9' by 12' that features log cabin siding and a gable roof with asphalt shingles. The privy and tool shed, built in 1964, are square buildings built with vertical boards and covered with a hip roof with asphalt shingles. The tool shed measures 6' by 9'. The non-contributing privy is a square building built with vertical boards and covered with a hip roof with asphalt shingles.



Gale Cottage

The Gale Camp and its associated structures detract from the opportunity for solitude in wilderness as it can be seen from adjacent wilderness areas. Though the structures are small, they are developments that detract from the undeveloped quality of wilderness. When entering Tobin Harbor by boat (non-wilderness) from the northeast, Gale Camp comes into view. The structure location along the shoreline is predominately visible from the water (non-wilderness), but can also be visible from within wilderness, affecting solitude.

The Gale Camp contributes to the fifth quality of wilderness character – other features of value. The Gale Camp is associated with early independent women using wilderness. The first Gale family member to come to Isle Royale was a single mother. The Gale cottage and tool shed and privy are among only three known buildings in Tobin Harbor that were designed with professional assistance. The Gale cottage has some unique and uncommon features. It includes the most unique window arrangement in Tobin Harbor where small windows are aligned with each bed in the bunkroom and contains one of only three stone fireplaces in Tobin Harbor.

Conclusion: The Tobin Harbor Historic District, and the remaining camps within the District, are necessary to convey the historic values of Isle Royale's wilderness. The Gale cottage, guest cabin, and the tool shed and privy collectively comprise the Gale Camp and contribute to the significance of the District as a whole. The structures are in good condition and retain high historic integrity. The Gale cottage and tool shed and privy include special features, window arrangement and stone fireplace, that are not common in other structures in the District. The camp's placement in vicinity to other camps contributes to an understanding of how the families lived together in Tobin Harbor. Thus, the Gale cottage, guest cabin, and the tool shed and privy are necessary to preserve the historic values of the Isle Royale Wilderness.

1.7.1.6 How Camp

The How Camp is located on How Island, a 0.16 acre island in Tobin Harbor and includes two contributing buildings, the original cabin built ca.1906, and a larger cottage built by Rock Harbor cottager Fred Manthey in 1937 (How Cottage). Remnants of a dilapidated privy are considered a landscape feature and have decayed the point that they are no longer considered to be a structure. Similar to Dassler Camp history, Cavin How Sr. purchased their Tobin Harbor property after

first camping on location for a few seasons. The property was purchased from Alfred and Jane Merritt, who owned several properties in the Tobin Harbor area.

The original cabin is a narrow rectangular building, measuring about 18' by 11', with a porch along the dockside, or south, elevation. The cabin is built very close to Tobin Harbor, just several feet from the water. Originally, a dock extended in the lake directly from the cabin. This dock is no longer extant. The island is narrow and the 24' by 27' cottage and porch straddles the width of the entire island. Like the Gale Cottage and Gem Island Cabin, the How Cottage was built just prior to park establishment. The timing of its construction was likely because the family knew improvements would not be permitted following federal purchase and were interested in having a more modern (at the time) and spacious building to augment the smaller cabin.



How Cabin

Both the original cabin and How Cottage are visible from all Tobin Harbor aspects where How Island is within view. The structures are highly visible from the water (non-wilderness). The structures detract from the opportunity for solitude and undeveloped quality of wilderness on How Island and the surrounding wilderness islands. Although both structures are small, views of the structures are not obstructed by vegetation. Wilderness visitors on other islands may be able to see the How Camp structures from the shoreline depending on where they are standing.

The How Camp contributes to the fifth quality of wilderness character – other features of value. Like the other Tobin Harbor founders, the How family contributed to the park's establishment and was involved with the IRPA. The How Camp retains historic value for its relationship to the history and stories of people and their life on the island or historic events that led to the creation of the park. The camp's location, right on the waterfront, while making the structure more visible, is unusual. Thus, the structures in the camp, as described above, contribute to the significance of the Tobin Harbor Historic District which contributes to the fifth quality of wilderness.

Conclusion: Tobin Harbor Historic District, and the remaining camps within the District, are necessary to convey the historic values of Isle Royale's wilderness. The original cabin and the How Cottage collectively comprise the How Camp and contribute to the significance of the District as a whole. The How family's contribution to Isle Royale as a national park and the structures contribute to the historic values of Isle Royale's wilderness. The original cabin and How Cottage are in good condition and retain high historic integrity. The camp's placement in vicinity to other camps contributes to an understanding of how the families lived together in Tobin Harbor. Thus, the original cabin and How Cottage are necessary to preserve the historic values of the Isle Royale Wilderness.

1.7.1.7 Kemmer Camp

The Kemmer Camp is located on a one-acre parcel along the north shore of Tobin Harbor. The camp is at the west end of the Tobin Harbor Historic District. The Kemmer Camp contains five contributing structures to the District including a cottage, guest cabin, boat house, privy, and storage building. A second non-contributing privy built in 1990 is also located within the camp.

This privy is not historic and its necessity will be determined through a separate programmatic MRA.



Kemmer Guest House

The cottage is perched on a rocky outcropping on the south shore of the property. The rectangular building measures 37' by 20'6" and features clapboard siding with corner boards and a gable roof with various slopes. A set of concrete steps leads from the northeast entrance to the cottage then continues partway down the hill toward the guest cabin and the waterfront. The guest cabin is located on a point at the east end of the site. It was likely built in the early 1930s. The building measures 8'4" by 18'4" and features drop-lap siding, corner boards, and a gable roof covered with asphalt rolled roofing. A trail leads past the storage building to the boat house. Built on a hillside, the

boat house is perched above the shoreline on the north side of the camp. The building measures approximately 10' by 20'. Double doors create a large opening on the lakeside elevation. The historic privy is located off a trail that leads to the west from the cottage. The square building is constructed with vertical boards. The storage building is a rectangular building measuring 6'4" by 13' that is covered with a shed roof with rolled asphalt roofing. Both the cottage and the guest house include a wide assortment of window types atypical for the area.

The camp's location makes it visible from both non-wilderness and wilderness areas, detracting from the opportunity to experience solitude. Views of the structures are only partially obstructed by vegetation. Depending on where they are standing, wilderness visitors may be able to see the buildings from the adjacent woods and islands. Though the structures within the camp are small and fit lightly within the landscape, they are considered developments and thus detract from the undeveloped quality of wilderness.

The Kemmer Camp contributes to the fifth quality of wilderness character – other features of value. The Kemmer Camp's connection to art as well as the unique story of women living independently in wilderness is unique and contributes to the necessity of this camp to the integrity of the Tobin Harbor District. The camp is important because of the role of the Kemmer and Underwood women in the creation of the park, the site's construction history, and because this is one of only two boat houses left in the district. The Kemmer Camp is located on the main island of Isle Royale, and accessible via the trail system of the park, meaning it is more likely to be directly accessed by more park visitors (most visitors to the Island's wilderness areas are hikers). However, the camp is a destination at the end of an unmaintained spur trail, meaning that most visitors to the site would be those seeking to experience the wilderness qualities associated with historic values.

Conclusion: The Tobin Harbor Historic District, and the remaining camps within the District, are necessary to convey the historic values of Isle Royale's wilderness. The cottage, guest cabin, boat house, privy, store house and steps collectively comprise the Kemmer Camp and contribute to the significance of the District as a whole. The Kemmer and Underwood contribution to Isle Royale as a national park and the structures contribute to the historic values of Isle Royale's wilderness. The cottage, boat house, storage building, and steps are in fair condition and retain historic integrity. The guest house is in good condition and retains high integrity. The privy is in poor condition. The camp's placement in vicinity to other camps contributes to an understanding

of how the families lived together in Tobin Harbor and are necessary for a continued understanding of how these families lived together in wilderness. The Kemmer Camp steps are necessary to illustrate the subtle differences between the camps and the efforts by the residents to add features needed for increased accessibility to the wilderness. Thus, the cottage, guest cabin, boat house, privy, store house and steps are necessary to preserve the historic values of the Isle Royale Wilderness.

1.7.1.8 Mattson Fishery

The Mattson Fishery is located along the south shore of Tobin Harbor, just to the south of Minong Island, on a 1.21 acre parcel of land that measures 175' by 300'. Louis Mattson Sr. was among several fisherman that started fishing in Tobin Harbor as early as the 1890s, which represents the earliest residential use of the District. The majority of the structures are located along the hillside above Tobin Harbor. A winding path leads from the dock up the hill to a flatter area where the buildings are sited. A steep path leads from behind the Art Mattson cottage to the crest of the hill where a garden was located. At one time there were at least 11 structures associated with this fishery, many of which were situated along the waterfront. The remaining extant structures that contribute to the Tobin Harbor Historic District and wilderness character include the Art & Inez Mattson cottage, Ed Mattson cottage, guest cabin/net house, net house, privy, and fishing shed. Other structures that are present but have not been found to contribute to wilderness character due to extreme deterioration are a chicken coop and woodshed.



Mattson Fishery Fishing Shed

Beginning at the waterfront, the fishing shed is located along shore adjacent to the location of the former fish house, which was dismantled in 2018 due to poor repair and impending collapse. The fishing shed is a rectangular building measuring approximately 8' by 10' and features drop-lap siding and a shed roof covered with asphalt rolled roofing. The northern edge of the building perches over the water. In 2021, the fishing shed was dismantled in preparation of needed cribbing repair below the structure. Full sections of this structure are now resting upright beside the waterfront awaiting reassembly after crib rehabilitation. The Art & Inez Mattson cottage is a

rectangular building measuring 30'6" by 20' with a lean-to section at the southwest corner measuring 10' by 9', a rear porch measuring 15'7" by 6', and a front porch measuring 16'7" by 6'. The Ed Mattson cottage measures 20' by 15'9" with a 9' by 7'4" lean-to addition at the rear. The cottage has experienced a persistent insect infestation that has caused serious damage to the building. The roof over the rear lean-to section of the cottage has largely collapsed and the roof over the remaining cottage is in deteriorating condition.

The guest cabin/net house was completed in 1937 and it is built into the hill below the garden. The building measures 14' by 12' and features drop-lap siding, corner boards, and a gable roof covered with asphalt rolled roofing that extends over a porch that runs the length of the north elevation. The building was used as a guest cabin for only a short period of time. By 1940, the building was used for storing fish nets. The net house was built in the 1920s or early 1930s and is a rectangular frame building measuring 12'3" by 8'3" with a roof in deteriorated condition. The privy is a small rectangular building (approximately 4' by 5') that features drop-lap siding, corner boards, and a shed roof covered with asphalt rolled roofing.

The fishery's location in a wooded area and away from the shore makes it minimally visible from both non-wilderness and adjacent wilderness areas, detracting slightly from the opportunity to experience solitude. Due to extensive overgrowth, the structures are only somewhat visible from the water (non-wilderness) and somewhat visible within wilderness. Views of the structures are almost fully obstructed by vegetation. Wilderness visitors may be able to see the buildings if they were hiking off-trail on the Tobin Harbor peninsula and possibly from across the harbor on the Lookout Louise trail depending on where they are standing. The structures, though small, are considered developments thus they detract from the undeveloped quality of wilderness character.

The Mattson Fishery, though reduced from its original footprint, contributes to the fifth quality of wilderness character – other features of value, though that contribution is limited because the remaining structures are a smaller portion of the original fishery composition than, for example, Fisherman's Home. In addition to their fishing activities, Art Mattson and his wife Inez played a pivotal role in Tobin Harbor's summer community. Art constructed a number of the cottages, built docks, and helped the summer residents maintain their camp buildings. He also repaired boats and motors. A sign over the entrance to one of buildings at the Mattson Fishery buildings stated, "Mattson Repair Shop." Art would meet the summer residents when they arrived on Isle Royale and transport them to their camps. Inez opened and cleaned the cottages and would often have fresh baked bread and a hot meal waiting for them upon their arrival. The Mattson family has continued to visit and maintain the fishery under a special use permit. Mattson Fishery Cottage represents the only fishery in the Tobin Harbor Historic District. When Mattson converted the fishery into a resort, it represented a regional trend in which areas in the North/Woods Great Lakes region, which had encompassed resource extraction industries, began a transition to embrace recreational activities.

Conclusion: The Tobin Harbor Historic District, and the remaining camps and fisheries within the District, are necessary to convey the historic values of Isle Royale's wilderness. The Art & Inez Mattson cottage, fishing shed, privy, and guest cabin/net house are integral to the Mattson Fishery and contribute to the significance of the District as a whole. The site is important to convey the significance of fundamental maritime resources such as fishing and the contributions of the fishing culture and community to the recreation and tourism industry. The fishery represents the earliest use of the District where commercial fishing activities usually preceded recreational use. Additionally, the Mattson family's contribution to the Tobin Harbor community as caretakers and the structures contribute to the historic values of Isle Royale's wilderness. The fishery's presence among several recreational camps contributes to an understanding of how the families lived together in Tobin Harbor and Thus, the Art & Inez Mattson cottage, fishing shed, privy, and guest cabin/net house are necessary to preserve the historic values of the Isle Royale Wilderness. The fish house is no longer extant on the landscape. The Ed Mattson cottage and net house conditions are so poor that they lack integrity. Thus, these three structures are not necessary to convey the historic values of the wilderness because the remaining structures are sufficient to convey the significance of the fishery and its contribution to Tobin Harbor Historic District.

1.7.1.9 Merritt Camp

The Merritt Camp is located on island #16, a 1.33 acre island to the north of the Snell Camp. The Merritt Camp includes six contributing structures within wilderness (a main cottage, two guest

cabins, a storage building, wood shed, a privy) and one contributing structure outside of wilderness (a dock).

The main cottage is located on a rocky outcropping at a narrow point on the east end of the island, providing views of Tobin Harbor in three directions. The main cottage, measuring 15' by 24' was built by Albert Ribenack in 1910. The first guest cabin, also known as the Parsonage, measures 10' by 12'6" and is covered with a steeply pitched gable roof with asphalt rolled roofing. The second guest cabin, Moose Manor, is approximately 12' by 13'. A storage building known as Deer Manor is a small rectangular building measuring approximately 8' by 10'. The privy is a small building (approximately 4' square) covered with a shed roof with asphalt rolled roofing. The wood shed is a small frame structure (approximately 6' by 8') covered with a shed roof with asphalt rolled roofing.



Merritt Moose Manor

These structures in the Merritt Camp detract from the opportunity for solitude and the undeveloped quality of wilderness character. The structures are visible from the water (non-wilderness) though some are partially hidden by trees. The camp is visible from the Snell camp, the Mattson fishery, and from the Minong Island mail dock and post office. It is visible to wilderness visitors if they are in the immediate vicinity. Though the structures themselves are small they are developments and thus detract from the undeveloped quality of wilderness character.

The Merritt Camp contributes to the fifth quality of wilderness character – other features of value. No Tobin Harbor family has a longer history on Isle Royale than the Merritt family. The Merritt family presence on Isle Royale dates to 1866 when Alfred Merritt first came to Isle Royale as a deck hand. The Merritts built an earlier camp near Blake Point and also had other landholdings on Isle Royale. When the Merritt's acquired the camp from Duluthian Albert Ribenack there were already two buildings on the island, the main cottage and a guest cabin known as the "Parsonage." The Merritts later acquired three additional buildings for the camp. A building was moved to the camp from Minong Lodge and a building and a privy were moved from the Bailey Camp. The tradition of moving structures from one location to another and using materials from other camps was common and illustrated how families lived on Isle Royale with limited access to materials for building new buildings. The Merritt Camp is one of the best examples of the historic practice of how Tobin Harbor families moved cabins from one place to another and added buildings over time. All of the contributing structures are of high integrity and are in good condition.

Conclusion: Tobin Harbor Historic District, and the remaining camps within the District, are necessary to convey the historic values of Isle Royale's wilderness. The main cottage, two guest cabins, a storage building, wood shed, and privy collectively comprise the Merritt Camp and contribute to the significance of the District as a whole. The Merritt family's early contribution to the development of the District, their contribution as leading members of IRPA to Isle Royale as a national park and the structures contribute to the historic values of Isle Royale's wilderness. The history of the structures in this camp, the relocation from one place to another on the island, speaks to the ingenuity required to live in a remote wilderness setting. The structures themselves

are all in good condition and retain high historic integrity. The camp's placement in vicinity to other camps contributes to an understanding of how the families lived together in Tobin Harbor and are necessary to convey the historic values of the Isle Royale Wilderness.

1.7.1.10 Minong Island Lodge Area

The Minong Lodge complex occupied 8.79 acres or the majority of the land on Minong Island, which was originally known as Margaret's Island. The complex served as a resort from 1900 through the 1930s. The resort included a number of service and support buildings that once numbered over 35 individual structures, but that are no longer present on the landscape. The focal point of the lodge was at the west end of the island. One lodge cabin (the Hillcrest Cabin) and a second cabin that was later used as the post office building for Tobin Harbor residents are the only surviving buildings at Minong Lodge area. Concrete foundation works (sills and pads) are faintly visible on the landscape from past structures that were demolished. The cabin and post office are considered contributing structures to the Tobin Harbor Historic District.

The post office building rests on the dock at the point where the dock meets the shore. The building is a small rectangular building measuring about 8' by 10' with drop-lap siding, corner boards, and a gable roof with asphalt rolled roofing. While its true origin is unknown, the building was moved to its current location by the early 1950s. The remaining cabin is located along the south side of the island with views of Tobin Harbor. Built in 1912, the Hillcrest Cabin is a square, one-story building that features a hip roof and a central brick chimney. Unlike the remainder of the Minong Lodge resort, the cabin escaped demolition so that it could serve as temporary lodging for Passage Island Lighthouse staff. This use was discontinued after the lighthouse was automated in 1978.

Because of its location at the head of a dock, the Post Office is visible from the water (non-wilderness). It would also be visible to wilderness visitors in the vicinity as there is no vegetation on three sides of the structure, thus detracting from the solitude quality of wilderness. It is also in close proximity to a major non-wilderness entry port for visitation at Rock Harbor and this diminishes somewhat the opportunity for solitude to this nearby wilderness area. The Hillcrest Cabin is only somewhat visible from the water (non-wilderness) due to the distance from the shore and the surrounding encroaching vegetation. Few wilderness visitors would notice it and would likely only find it if specifically looking for it from the shore or from the adjacent peninsula, thus its impacts on the solitude quality of wilderness character are de minimis. Though both the Post Office and remaining cabin are small structures, they are considered developments that detract from the undeveloped quality of wilderness character.

The Post Office and Hillcrest Cabin contribute to the fifth quality of wilderness character – other features of value. Fisherman Gust Mattson first opened the resort in about 1900 with his wife Margaret, for whom the island was originally named. Mattson had originally operated a fishery on the island and then began to offer accommodations to visitors as early as 1898. He then closed the fishery and focused his attention on operating the resort. He sold the resort in 1906, which changed hands a few times prior to federal purchase. In the early 1930s, the resort was renamed Minong Lodge. The Minong Lodge was the only resort in the Tobin Harbor District. It was once the focal point of Tobin Harbor and influenced the development of the camps within the Tobin Harbor Historic District. It was a gathering place and social hub for the summer residents. The Hillcrest Cabin is distinct in purpose from other buildings in the District. The lodge served as a

conduit for visitors in the Tobin Harbor area and was the main gathering point for the Tobin Harbor cottage community. The location hosted several annual meetings of the IRPA. The Post Office is historically important as it was a central meeting place for those living on the island. Isle Royale's isolation made "boat day," or mail day, an important day for residents as it was the only way to stay connected to family.

Conclusion: Tobin Harbor Historic District is necessary to convey the historic values of Isle Royale's wilderness. The Post Office and Hillcrest Cabin are the sole remnants of the Minong Island Lodge and its associated structures and contribute to the significance of the District as a whole. The Post Office represents an important aspect of living on Isle Royale as it served as a meeting place and provided the only means for receiving word from those off-island. These structures demonstrate how the families lived together in wilderness and provides the only remaining structures associated with the Minong Lodge. The Post Office remains in good condition and retains high historic integrity. However, the Hillside Cabin is in poor condition and lacks historic integrity. Still, the cabin does contribute to the District, and together with the Post Office, are two of only a few remaining features of the Minong Lodge site making them necessary to convey an understanding of a former lodge operation and its significance within the history of the Tobin Harbor District.

1.7.1.11 Siefert Camp

The Siefert Camp is located to the west of the Dassler boat house and the camp is located on a triangular parcel of land with 245' of lakeshore. The camp contains three contributing buildings: a cottage, a storage building, and a privy. The 0.247-acre parcel was purchased from Judge Dassler on October 22, 1925 and had been part of Dassler's original 2.8 acre property.

The Siefert cottage was built in the fall of 1925 by Art Mattson. The cottage sits on a hillside just above Tobin Harbor with views toward Minong Island. The building measures 22' by 20'4" and is supported on cedar posts and is one of the few cottages with a closet. The 4' square privy features drop-lap siding and a shed roof covered by asphalt rolled roofing. The storage building is a small rectangular building measuring about 8' by 10' that features tongue and groove siding, corner boards, and a gable roof covered with asphalt rolled roofing.



Siefert Cottage

These structures that comprise the Siefert Camp, though small, are considered developments and thus detract from the undeveloped quality of wilderness. The cottage and storage structures are visible from the water (non-wilderness) and only somewhat visible within wilderness due to the tree cover. The cottage is visible from wilderness locations opposite, such as Minong Island. Wilderness hikers would only encounter the cabin if hiking off-trail in the Tobin Harbor area. It is not on the park trail system.

The Siefert Camp contributes to the fifth quality of wilderness character – other features of value. The cottage reflects the interrelationship between the fisher families and the importance of their traditional skills to the development of the historic district. The Dassler, Connolly, and Siefert

camps are all connected to each other by a series of unmaintained social trails that convey the close relationships and interconnectedness the families had with one another.

Conclusion: Tobin Harbor Historic District and the camps of which it is comprised is necessary to convey the historic values of Isle Royale’s wilderness. The Siefert Camp contains three structures that contribute to the significance of the District as a whole and that contribute to the historic values of Isle Royale’s wilderness. The structures are in good condition and retain high historic integrity. The camp’s placement in vicinity to other camps contributes to an understanding of how the families lived together in Tobin Harbor. The structures, and interconnectedness of the camps are tied to the landscape cannot be replicated outside of wilderness. Thus, all three contributing structures in Siefert Camp are necessary to preserve the historic values of the Isle Royale Wilderness.

1.7.1.12 Snell Camp

The Snell Camp is located on a 0.574 acre parcel of land that includes 100’ of shoreline along Tobin Harbor. The property is 250’ deep. The Snell Camp is located atop a steep hillside. A stairway from the dock leads up to the top of the hill. The stairs consist of steps formed with packed earth and wooden risers. There is a railing along each side of the stairway built with logs and poles. The camp includes four contributing buildings, a cottage, a guest house, a store house, and the “writer’s shack.” There is one non-contributing privy on the site that was constructed in 1983. This privy is not considered historic and its necessity will be determined through a separate programmatic MRA.



Snell Cottage

The cottage is a one-story, T-shaped building, sheathed with horizontal boards and covered with a gable roof with asphalt rolled roofing. The guest house is a one-story building located to the west of the main cottage. The guest house consists of two separate sections that are joined together, with each section measuring approximately 8’ by 12’. The store house is located on the edge of the hill overlooking Tobin Harbor. It measures 16’ by 7’ and features horizontal siding, corner boards, and a steep gable roof covered. The writer’s shack is located on the crest of a hill high above the Snell cottage. The writer’s shack is a square building that measures about 7’ by 7’ and is sided with plywood.

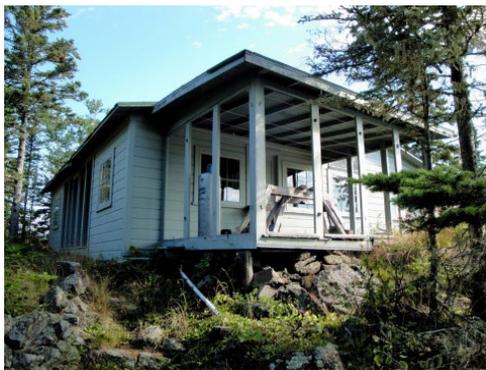
These structures, though small, are developments and thus detract from the undeveloped quality of wilderness character. The Snell Camp is high above the water on the south shore of Tobin Harbor. The cottage the steps leading up to the cottage are visible from the water (non-wilderness) while the store house is somewhat visible, and the guest house and writer’s shack are obscured by vegetation. The cottage, guest house and store house are somewhat visible within wilderness and detract from the solitude quality of wilderness character. However, dense vegetation surrounds writer’s shack and so visitors would have to be within immediate vicinity to readily view it, limiting its impact on solitude.

The Snell Camp contributes to the fifth quality of wilderness character – other features of value. Roy and Lucille Snell were from Wheaton, Illinois, where Roy wrote children’s books for a

living. Roy and Lucille Snell, along with their sons Jud, John, and Laurie, first came to Isle Royale in 1931 and rented a cabin in Rock Harbor. Lucille decided that Tobin Harbor would be a safer environment for her boys and the family proceeded to rent the Breen property beginning in 1932. The Snells purchased the property in 1936. The Snell family contributed to popularizing Isle Royale through the stories told in Roy's books. Snell published over 80 books under several names, many written at the Snell Camp.

Conclusion: Tobin Harbor Historic District, and the remaining camps within the District, are necessary to convey the historic values of Isle Royale's wilderness. The four contributing structures in Snell Camp contribute to the significance of the District as a whole, and the Snell family had a unique contribution to the historic values of Isle Royale's wilderness. The cottage is in good condition and retains high historic integrity. The remaining structures are in fair condition. The significance of the site which served as inspiration for 84 children's books were created that sold over two million copies. As the site inspired the novels, its significance and historic value is tied to the site within wilderness and cannot be replicated outside of wilderness. In addition, the camp's placement in vicinity to other camps contributes to an understanding of how the families (including previous owners the Breens) lived together in Tobin Harbor. Thus, cottage, guest cabin, store house and writing shack are all necessary to preserve the historic values of the Isle Royale Wilderness.

1.7.1.13 Stack Camp



Stack Cottage

The Stack Camp (sometimes referred to as Stack/Wolbrink) is located at the east end of Minong Island, within view of the Connolly and Siefert Camps. The Stack Camp is located on a 0.78-acre parcel of land and includes four contributing buildings: the main cottage, guest cabin, and one privy.

The cottage is the largest remaining summer residence in Tobin Harbor and measures 32'4" by 32'4", consists of seven rooms, and contains a brick hearth that was later modified to accommodate a cast iron stove. The cottage is filled with original furnishings and is an excellent representation of an interior from the 1920s and 30s. Built around 1920, the guest cottage, or "Wee Hoose," measures

22'6" by 12'4" and features drop-lap siding, corner boards, and a hip roof covered with asphalt rolled roofing. The West Privy is a square building located near the guest cottage and the walls and the door are built with horizontal siding. A second privy burned up in a fire and is no longer extant. The retaining wall is part of a modest stone stairway that is located between the two cabins.

When entering Tobin Harbor by boat from the northeast, the Stack/Wolbrink Camp comes into view. These structures, though relatively small, are developments and thus detract from the undeveloped quality of wilderness. The main cottage is visible from the water (non-wilderness) and often the first building seen when coming around Scoville Point into Tobin Harbor by boat. The guest cottage is less visible, being on the north side of the island and partially obscured by trees. Both structures are somewhat visible within wilderness detracting from the solitude quality

of wilderness. The Stack/Wolbrink Camp encompasses views of the Siefert, Connolly, Beard, How, and Gale Camps, visually connecting these remaining camps within the cultural landscape.

The Stack Camp contributes to the fifth quality of wilderness character – other features of value. The Stack Camp represents one of the founding camps of Tobin and a central meeting place for discussion of the IRPA in working toward the establishment of the park. The camp also represents the interaction between the NPS and landowners as the Stack daughter, Florence, met the NPS architect planning the new national park, Don Wolbrink, while he was working in the park. They married and often returned for summer visits. This, along with the high integrity displayed in the camp's design and construction contribute substantially to the story of life on the island and the creation of the park

Conclusion: The Tobin Harbor Historic District, and the remaining camps within the District, are necessary to convey the historic values of Isle Royale's wilderness. The Stack Camp contributes to the significance of the District as a whole and contributes to the historic values of Isle Royale's wilderness. The main cottage is in good condition and retains high historic integrity. The guest cottage and privy are in fair condition while the retaining wall is in poor condition. The camp's placement in vicinity to other camps contributes to an understanding of how the families lived together in Tobin Harbor. Because it is tied to the landscape, it cannot be replicated outside of wilderness. The camp also represents the significant story of land acquisition and development of the park. Thus, the main cottage, guest cabin, and remaining privy are necessary to preserve the historic values of the Tobin Harbor Historic District and the Isle Royale Wilderness.

1.7.2 Fisherman's Home Cultural Landscape

Fisherman's Home is located on Houghton Point near the south-central portion of Isle Royale. The fishery complex is spread across approximately two acres of a small peninsula between a sheltered inlet and Lake Superior. The site is accessed by boat only, there are no trails in this area of the park. The fishery is the most complete example of a historic commercial fishery within the park. Fisherman's Home was, and is, noted for its isolated location. Situated on a narrow peninsula along the outer edge of Houghton Point, the landscape affords two very striking views. To the northwest, beyond the narrow breadth of Seglem's Harbor, is the tree covered face of a steep and rocky ridgeline.

Fisherman's Home retains historic integrity as a representative commercial fishery complex. The site contains 12 structures and is regarded as a complete collection of fishery-associated structures and objects. The fishery includes the main residence, guest cabin, double-hole privy, store room, tool shed, two help's quarters, fish house, net house, a dry-laid stone wall, a smoker, net-drying reels, and a non-contributing sauna. The sauna is not historic and its necessity will be determined through a separate MRA.



Fisherman's Home Help's Quarters #1

The main residence is a one-story, three-room building, with a rectangular plan, a gabled tarpaper & batten roof with exposed rafter tails, and rolled tarpaper siding. The building is 12' wide by 36' long. The 12' wide by 24' long guest cabin is a one-story, two-room building with a rectangular plan and a gabled roof with rough horizontal board siding with corner boards, built to the north of the residence. A privy is located behind and east of the main residence. The privy is a one-story, two-hole outbuilding that is 6 square feet. The store room is a one-story, one-room building with a rectangular plan, vertical board sided, gabled roof w/asphalt roll roofing. It is located

northwest of the guest cabin and measures 10' wide by 12' long and features a vertical board door and adjacent 6/6 window on the west gable end. The tool shed is a one-story, one-room structure with a rectangular plan located west/northwest of the store room that is 12' wide by 18' long. Help's Quarters #2 is located southwest of the tool shed and is 12' wide by 16' long. It is a one-story, two-room, rectangular plan building with vertical board siding and tarpaper with battens, and a gabled roof with pole purlins and asphalt roll roofing.

The waterfront fish house is 14' wide by 18' long with a deck surround. The full dimension of this footprint is 22' wide by 30' long. The building is a one-story, one-room, rectangular plan structure with a gabled roof, and is seated on a crib dock foundation. The net house is a one-story, two-room, rectangular plan building with vertical board siding and gabled roof with asphalt roll roofing. The building is 14' wide by 32' long. Help's Quarters #1 is located at the far southwest end of the fishery and is 12' wide by 16' long. It is a one-story, two-room building with horizontal board siding and a gabled roof with asphalt roll roofing. The dry-laid stone wall is an approximately eighty-five linear foot, dry-laid sandstone serpentine wall located west of the main residence and the Help's Quarters #2. It defines the boundary of a rock garden and opens to a stone pathway that leads to the Lake Superior shoreline. The smoker is a small, shed roofed structure approximately 4' tall, with horizontal board and batten siding. Three net-drying reels are located on shore near the fish house with 12' long and 6-8' diameter elevated wooden reels. The non-contributing sauna is located on the shoreline at the southwest end of the harbor.

The fishery structures detract from the undeveloped quality of wilderness. The structures are not highly visible from the water (non-wilderness) and thus would generally not be visible to park visitors unless they were seeking out the site. Fisherman's Home is extremely remote and difficult to access, even by water, since larger boats are unable to access the site through a shallow channel. There are no trails that access this site. Any future visitors to this site would likely be seeking experiences associated with the historic qualities of the Isle Royale Wilderness so the impacts to the solitude quality of wilderness would be minimal.

Fisherman's Home contributes to the fifth quality of wilderness character – other features of value. Fisherman's Home is noted for its isolated location. Situated on a narrow peninsula along the outer edge of Houghton Point, the landscape affords two very striking views. To the northwest, beyond the narrow breadth of Seglem's Harbor, is the tree covered face of a steep and rocky ridgeline. To the southeast is the vast expanse of Lake Superior. The shoreline features large sandstone outcrops and stands of pine. Early residents of the site, the Seglems, took a number of photographs featuring this view of the lake and shoreline, indicating an appreciation

of its scenic value. Because neither view appears to have been overtly altered by human impact, both exhibit a timeless quality that greatly contributes to the historic “feel” of the cultural landscape.

Fisherman’s Home retains high historic integrity as a representative commercial fishery complex. It is one of the most intact historic fisheries in the park. The site contains a complete collection of fishery-associated structures and objects. Beginning in the 1890s, the complex served various crews of seasonal commercial fishermen. Fisherman’s Home buildings are all vernacular single-story, wood frame, gabled structures typical of the Isle Royale fisheries. Fisherman’s Home is also an FRV. The NPS is planning to evaluate historic commercial fisheries for potential designation as a national historic landmark due to the high historic integrity and believed national significance of this site.

Conclusion: Fisherman’s Home is necessary to convey the historic values and significance of the Isle Royale wilderness. Nine of the structures are in fair condition while three are in poor condition. All retain historic integrity. The sauna structure is non-contributing. The fishery structures at Fisherman’s Home contribute to an understanding of how folk fishermen subsisted in a remote wilderness setting. The historic structures that within the Fisherman’s Home Cultural Landscape are necessary for a continued understanding of how people historically interacted with a remote section of the island wilderness, where self-reliance was a more salient aspect of daily routine. The site is significant as an intact fishery with high integrity and all historic structures are necessary to adequately and accurately convey its historic values and contribution to wilderness character.

1.7.3 Crystal Cove Cultural Landscape

Crystal Cove is located on the northeast tip of Amygdaloid Island, which is near the northeast end of the Isle Royale archipelago. It is named for the small cove that provides shelter from the open waters of Lake Superior. The 8.4-acre cultural landscape includes a complex of structures and pathways, bounded by the Lake Superior shoreline and the island interior. The structures generally date to the early 1920s when George Winston Megeath created a private resort to entertain family and friends (HSR 1999). No life lease was taken and the property was abandoned following federal purchase in the late 1930s. However, in the 1950s, the NPS moved long time island fisherman Milford Johnson to the Crystal Cove property where he fished until his death in the late 1970s. As a result of Johnson’s tenure, the property presents several fishing related features such as a smokehouse, net reels, and a steel fishing boat.

The Crystal Cove Cultural Landscape is an excellent example of an Isle Royale private resort. It was built in the early 1920s at the height of the Isle Royale tourist industry. Part of the original compound was a system of wood boardwalks that connected the buildings and docks. Only a few remnants of the boardwalks exist today. The structures on-site that contribute to wilderness character include: the original main lodge, the main cabin, two guest cabins, a storage shed, a generator house, a smokehouse, the remnants of a fuel shed, and system of boardwalks. Additionally, the landscape includes non-historic net-drying reels and an NPS dock.



McGeath Main Lodge

The main lodge, constructed of saddle-notched, peeled logs ca. 1920, is a one-story “I” shaped structure that measures 61’ by 36’. There are three sections, with two wings on either end of a large center room that provided a central dining location for the compound. The ends of the wings have hipped roofs while the east and north/south elevations are gabled ends. There is a massive uncoursed stone chimney in the center of the middle section. The main cabin is a 31’ by 21’ one-story structure with peeled log, tightly filled with quarter rounds and of the saddle-notched construction method. Built ca. 1920, this was the main residence for the Megeath family. There is a massive exterior chimney on the north elevation with rubble coursing and tooled mortar.

Guest cabin #1 was constructed of saddle-notched, peeled logs ca. 1920. It is a one-story, two-room, 25’ by 15’ rectangular plan structure with a hipped rolled asphalt roof. Guest cabin #2 is essentially identical to guest cabin #1. Constructed of saddle-notched, peeled logs ca. 1920, it is a one-story, two-room, 25’ by 15’ rectangular plan structure with a hipped rolled asphalt roof.

The generator house, storage shed, smokehouse and fuel shed were also constructed in the early 1920s. The generator house is a one-story, one-room rectangular structure with a hipped roof and milled rafters that has beveled ends. This building is also constructed of peeled log walls with saddle notching and interstices filled with quarter rounds. The generator house is a unique structure on Isle Royale, supplying electric power when electricity and indoor plumbing were extremely rare luxuries on the island. The building can be viewed as a reflection of Megeath family’s wealth and stature among Isle Royale contemporaries. This structure was located south of the main cluster of buildings so that the noise did not disturb the Megeath family and their guests. The storage shed is a one-story structure with drop-lap siding with corner boards. It featured a hipped roof, which has since collapsed. It is also missing window panes and generally in severely deteriorated state. The entrance is a five panel door on the north elevation. Originally used for storage, it later became a net house during the Johnson family fishery operations. One of the siding boards is stamped. “G.W. MEGRATH BELLE ISLAND ISLE ROYAL MICH.”

The smokehouse is a one-story, one-room rectangular building with a shed roof and milled 2’ by 4’ rafters. The structure is built of drop-lap siding with corner boards and a vertical board door on the south elevation. A smoke hole appears above the door and smoke stains are evident around the door and eaves. There is a rusting woodstove outside with a chimney pipe that connects to the smokehouse. This installation is not original and came about during Milford Johnson’s tenure at the Crystal Cove complex.

The fuel shed is an original site component and was built across the harbor from the main complex for safety. The 15’ by 12’ log structure is located along the shoreline and once featured a hipped roof and adjacent dock. Little remains of the fuel shed except for bottom courses of log and submerged crib ruins. The structure is now referred to as the fuel shed ruin.

These extant structures in Crystal Cove detract from the undeveloped quality of wilderness. The main cabin, main lodge, and guest cabins 1 & 2 are not highly visible from the water (non-wilderness) or within wilderness. With the exception of the generator house, all other structures are tucked discretely behind a tall ridgeline. The log construction of the buildings and uncoursed stone chimneys reflect aspects of the natural surroundings; the structures are immersed within the environment rather than imposed upon it. Crystal Cove is remote and may only be accessed by boat. There are no trails that access this site. Visitors to this site would likely be seeking experiences associated with the historic qualities of the Isle Royale wilderness.

The Crystal Cove Cultural Landscape contributes to the fifth quality of wilderness character – other features of value. Crystal Cove is significant for its role in the tourism movement on Isle Royale in the early twentieth century as a private resort complex. It is also significant as it represents an excellent example of the Rustic architectural style. The historic log structures, considered to have been built by Emil Anderson, display a superior level of craftsmanship. The peeled logs are tightly joined with saddle notching and quarter round chinking. The dimensional uniformity of the selected logs implies that they were ordered to specification and shipped to the site. Additionally, care was taken to alternate the direction logs were laid, so that the taper of the tree trunks received incremental corrections.

With the exception of the main lodge, all of the buildings feature hipped roofs, likely intended to minimize the potential impact of high winds. Both the main lodge and the residence feature massive, coursed stone chimneys. The level of significance is local and the period of significance spans from 1920, when George W. Megeath began construction of his private complex on Amygdaloid Island until 1939, when John Nixon, the subsequent owner, sold the property to the NPS for acquisition into the Isle Royale National Park. Additional information can be found in the Crystal Cove Cultural Landscape Inventory (NPS 2013) describing the cultural significance of the landscape and maintenance and preservation history.

Conclusion: The Crystal Cove Cultural Landscape, as constructed by George Mcgeath, is necessary to convey the historic values and significance of the Isle Royale Wilderness. Crystal Cove is an excellent example of an Isle Royale private resort compound. It was built in the early 1920s at the height of the Isle Royale tourist industry. The establishment of the Megeath Compound at Crystal Cove coincided with a larger national trend of increased outdoor recreation. The cabin, main lodge, and guest cabins 1 & 2 are in good and fair condition and retain high historic integrity. Crystal Cove contributes to an understanding of early tourism to Isle Royale and these four structures are necessary to convey a continued understanding of how people historically interacted with wilderness in this remote section of the archipelago. The boardwalk remnants, fuel shed ruin, generator house, smokehouse (not original to Crystal Cove), and storage shed contribute to the historic character of the area, but are not necessary to preserve the historic values of the Isle Royale Wilderness. These structures have deteriorated to the point that they have lost much of their integrity. The Crystal Cove structures that are in good and fair condition are sufficient to preserve the historic values of the Crystal Cove Cultural Landscape and the Isle Royale Wilderness.

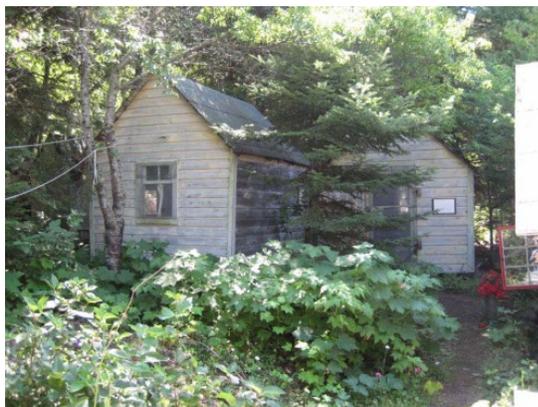
1.7.4 Bangsund Fishery

The Bangsund Fishery was initially built and used as a commercial fishery by Jack Bangsund. The site was originally constructed between 1895 to 1934, and structures were erected and configured as necessity dictated. This was typical for development of fishery complexes on the island. The pattern of development resulted in “temporary” or seasonal structures intended for short term uses that were then recycled by later occupants for different uses. Materials selected for construction reflected economy and availability; “structures were simple, built out of materials that were inexpensive and found at hand, such as logs, salvaged lumber from shipwrecks, or buildings and materials salvaged from other sites and structures.” (Franks, 1999) The remoteness of the island contributed to the vernacular character of the structures. Bangsund moved several buildings to his fishery, including a generator house from the Civilian

Conservation Corps (CCC) camp at Daisy Farm. The recycling of buildings was common practice at Isle Royale prior to its establishment as a national park.

The fishery remained as originally built until Bangsund's passing in 1959. The prior year, in 1958, Durward Allen and graduate student, Dave Mech, of Purdue University, started a wolf-moose study at the park. After Bangsund's death, the NPS allowed Allen and Mech to use the Bangsund main residence for summer field work. In 1975, Allen retired and Rolf Peterson took over the wolf-moose project. Use of the Bangsund cabin as a base for this project, and of the sleeping cabins in association with the study, continues today. Bangsund has accreted some non-historic structures since the research project began at the location. These facilities include a modern yurt, wood shed, moose antler storage shed, kayak rack, and vertical wind turbines. Since they are non-historic, their necessity and treatment will be analyzed in a separate MRA.

The historic main residence is a one-story, gabled, horizontal log building with a wood sided addition on its north side. The original portion of the cabin runs east/west and is 18' by 22'. A 12' by 18' addition serves as the bedroom. The conjoined footprint is now approximately 30' by 22'. Sleeping Cabin #1 was originally located at Minong Lodge in Tobin Harbor. It has a gabled roof, exposed rafter tails, and drop-lap siding with corner boards. The door is placed asymmetrically with an adjacent six-light window. There are two other windows of varying configurations. Like the Sleeping Cabin #1, Sleeping Cabin #2 was also moved from Minong Lodge. Sleeping Cabin #2 is a one-story cabin with a gabled roof, exposed rafter tails, and drop-lap siding with corner boards. Both sleeping cabins are small, one-room cabins, and each is approximately 8' by 10'.



Bangsund Sleeping Cabin

These structures detract from the undeveloped quality of wilderness. The main residence is highly visible from the water (non-wilderness), but it and the two sleeping cabins are not easily viewed from within wilderness, limiting their impacts on the solitude quality of wilderness character. The Bangsund site is most accessible by water. The site can also be reached by a dead end spur trail from the Edison Fishery. It is not on the main park trail system. Any visitors to this site would likely be seeking experiences associated with the historic qualities of the Isle Royale wilderness or the wolf-moose project work.

Bangsund contributes to the fifth quality of wilderness character – other features of value – due to its role in research on Isle Royale as base camp for summer field work of the wolf-moose predator prey study that has been in progress since 1958.

Conclusion: The Bangsund Fishery has been evaluated and found not to retain sufficient integrity as a fishery to be eligible for listing in the National Register. However, it has not yet been evaluated to determine whether it is National Register eligible for its association with scientific research in wilderness, specifically the 60+ year wolf/moose predator/prey study. If found National Register eligible, the NPS would evaluate the historic structures at this site for their necessity to convey the historic values of the Isle Royale Wilderness. If eligible, it is likely that the main cabin and two sleeping cabins would be found necessary to convey its historic

values. All three structures are in good condition and retain high historic integrity. They contribute to an understanding of research endeavors at Isle Royale, specifically the wolf/moose study, and are thus tied to their location within wilderness and scientific understanding of predation within wilderness. If not found eligible, the structures would likely not be found necessary. The Wilderness Stewardship Plan recommends their removal, which would be the subject of a separate MRA.

1.7.5 Captain Kidd Cultural Landscape

The Captain Kidd Cultural Landscape occupies approximately 1.72 acres on the northeastern tip of Captain Kidd Island to the northwest of the northeastern portion of Isle Royale in a small sheltered cove on the eastern side. Wayne McPherren purchased the property in 1934. The McPherrens followed a rustic style in the construction of their main cottage, although the craftsmanship is not quite equal to Anderson's. Similar to other island communities, Isle Royale occupants frequently constructed their structures of recycled materials, whether using timber from an old boat or another structure. Often, the structures were relocated from camp to camp and island to island in their entirety. Thus, many of the camps display vernacular styles subject to what construction materials were on hand or could be repurposed. In this manner, the McPherrens acquired a sleeping cabin and the bath house from Crystal Cove, and another sleeping cabin from Clay Island. Like Crystal Cove, the Captain Kidd complex is located in the more isolated eastern side of the Isle Royale wilderness.

The complex currently consists of the McPherren Cabin, Sleeping Cabin #1 (19237), Sleeping Cabin #2 (1922), Sleeping Cabin #3, a boat house, a bath house (1920), a tool shed (1915), and a flag pole. The Captain Kidd Cultural Landscape was determined eligible for listing in the National Register at a local level of significance. Its period of significance spans 1920 when George Megeath began construction in conjunction with his Crystal Cove complex until the 1940 acquisition by the NPS.

The McPherren Cabin is a one-story 24' by 14' gable-roofed structure with exposed pole rafter tails. It is constructed of peeled log walls of tamarack and spruce with saddle-notched corners. There is an exterior stone chimney centered on the west elevation. The cabin was constructed in 1937 on the footprint of a cabin that had burned the year prior; the stone chimney was integrated into the new structure. Sleeping Cabin #1 is



McPherren Cabin

a one-story frame structure with a central pyramidal hipped asphalt shingled roof and two opposing shed additions on the east and west elevations. The central portion measures 8' by 8'. This structure was moved from Crystal Cove to Captain Kidd Island in 1940 following NPS acquisition of Amygdaloid Island. The eastern shed addition has collapsed. Sleeping cabin #2 was built in 1922. It is a one-story, two-room duplex rectangular structure with a hipped roof. The log structure measures 32' by 18'. There are two entrances on the north façade to each room. Sleeping cabin #3 dates from ca. 1916-1917 and was originally constructed at Clay Island and moved to Captain Kidd. It is a one-story, 18' by 12' log structure with a pyramidal hipped roof covered with rolled asphalt. All three sleeping cabins are deteriorated and in poor condition.

The boat house was built by Wayne McPherren ca. 1940. The one-story frame structure features a gable roof with asphalt shingles. It is built of salvaged vertical board siding, includes a side shed addition and horizontal board doors with rope pulls. The boathouse measures 20' by 18' and is in poor condition.

The bath house is a one-story, one-room 12' square structure with a pyramidal hipped roof with pole rafters. It partially rests on two log sills and has peeled log walls with saddle notching. This structure was also relocated from Crystal Cove to Captain Kidd in 1940.

The tool shed is a one-story, one-room, 8' square structure of peeled logs with a pyramidal hipped roof with pole rafters. The sills are deteriorating and the walls are sagging while the structure as a whole is set directly onto the ground.

The structures within the Captain Kidd Historic District are considered developments, thus detract from the undeveloped quality of wilderness character. The structures at Captain Kidd are visible and accessible from the water. There are no trails to the site. Because of the remote location of the island, it is generally not visible from wilderness unless visitors specifically traveled to the island, and thus has limited impacts on the solitude quality of wilderness character.

Captain Kidd Cultural Landscape contributes to the fifth quality of wilderness character – other features of value. The site is significant for its role in the early twentieth century recreation movement on Isle Royale as a private resort complex. It is also significant because it represents Rustic Architecture integrated into island vernacular. Local fisherman Emil Anderson built the 1915–1922 structures to house the employees who served the George Megeath family at nearby Crystal Cove. The Captain Kidd Cultural Landscape, in its supporting role to Crystal Cove, was not as highly designed and far more basic and utilitarian. Some of the log structures at the site display a similar level of craftsmanship as those constructed at Crystal Cove.

Conclusion: The McPherren Cabin is in good condition and retains high integrity. It is significant because it represents Rustic Architecture integrated into island vernacular. Thus, it is necessary to convey the significant contributions the site played in the early twentieth century recreation movement on Isle Royale first as an auxiliary to a private resort complex and later as a private summer camp. This cabin is necessary for the continued understanding of how people historically interacted with wilderness. This cabin is sufficient to represent the wilderness values associated with the site.

The bath house, boat house, flag pole, tool shed, and three sleeping cabins are in poor condition and lack historic integrity. Two of the structures were moved to the site from Crystal Cove and many similar structures in better condition remain at Crystal Cove. Thus, these structures are not necessary to convey the historic values of the Isle Royale Wilderness.

1.7.6 Wright Island Area

Wright Island may have been used as a commercial fishery as early as the 1830s when the American Fur Company reportedly rendered fish oil on-site. In the early 1900s, it was occupied by Sam Johnson, who had fished elsewhere on the island. Sam's son-in-law, Ed Holte, eventually took over the operation and fished into the 1970s. At one time, the site had seven structures associated with twentieth-century fishing activities. Today two cabins remain (the main residence and the kitchen addition of a separate residence cabin) and a privy. Both cabins

and the privy are in poor condition after numerous years of deterioration but are still considered eligible for inclusion in the National Register as a fishery resource. Other structures that once existed on-site were removed over the years as they fell into disrepair. A non-historic privy also exists on-site and its necessity will be determined through a separate MRA.



Holte Fishery, Main Residence

The original residence is a one-story side gabled log house. This portion of the building measures 24' by 12'. A wing and shed-roof addition was installed in the early 1930s, which measures 22' by 12'. The front porch was added in 1935 by Ed Holte. The pitched-roofed one-story dwelling, wing, and front porch are all constructed of saddle-notched logs rather than milled lumber which is typical of first generation Swedish-American construction on Isle Royale. The shed-roofed rear room is nailed. The roofs have pole rafters and are covered with tarpaper. There is also tarpaper skirting. Four and six light windows exist in various locations.

The 12' by 8' kitchen was built as an addition to the now removed semi-subterranean dwelling built by Mike Johnson ca. 1903. The kitchen was added to the eastern side, sometime between 1920 and 1930, creating an L-shaped plan. Unlike the dwelling constructed of notched logs, the addition is of frame construction. The milled lumber used in construction varies in size and may indicate that much of it was recycled from other buildings. The roof has a low pitch and is covered in tarpaper. The exterior was also covered in tarpaper, but the covering is no longer extant leaving the horizontal plank siding exposed. The kitchen addition has not been used since 1973. The original dwelling was removed in the 1990s following its collapse.

The three remaining structures on-site, though small, are considered developments and thus detract from the undeveloped quality of wilderness character. The cabins are tucked into a cove at Wright Island and are minimally visible from the water (non-wilderness). They would only be visible from wilderness if visitors specifically went to Wright Island seeking them out, thus have limited impacts on the solitude quality of wilderness. The site is only accessible by water.

While the structures at Wright Island do contribute to the fifth quality of wilderness character – other features of value – this contribution is minimal due to the poor condition of the structures and low integrity of the site.

Conclusion: The main residence, partial cabin, and the privy conditions are poor and the site has low integrity. Thus, they are not necessary for the administration of wilderness.

1.7.7 Johnson-Anderson Fishery

Herman Johnson and John Anderson established a commercial fishing on the north shore of Isle Royale ca. 1890. They eventually purchased the five-acre Johnson Island where they established their fishery. This was rare; many fishermen did not own property at Isle Royale. Fishing continued by the Johnson and Anderson families until the late 1950s. The fishery at one time included a main cottage residence, 3 cabins, 1 privy and 2 fish houses with docks. Only the Anderson main cottage with attached sleeping cabin, 2 other cabins (Herman Johnson cabin and John Anderson cabin) and a privy are left at the site. The two fish houses collapsed and have been removed. The location is not eligible for listing in the National Register as a fishery;

however, the remaining structures are individually eligible for their association with fishing history on this portion of the archipelago.

The one-story Anderson main Cottage has two hipped roofs with pole rafters and exposed tails. The plan is two independent rectangles separated at corners with a connecting log dogtrot. The northwest portion of the cottage measures 22' by 16'. The southeast portion measures 18' by 16'. The connecting dogtrot is 8' square. The privy is a one-story, rectangular two-hole privy with a hipped roof and pole rafters. The walls are horizontal peeled log with saddle notching and now chinking.



Herman Johnson Cabin

The Herman Johnson Cabin was built in 1912 and features a one-story rectangular plan comprised of dimensional lumber and horizontal clapboard siding. The cabin measures 18' by 12'. The second cabin, the John Anderson Cabin is of a similar age and also features a one-story rectangular plan comprised of dimensional lumber and horizontal clapboard siding. An 8' square addition was included on the cottage's south side. The original portion of the building measures 16' by 12'.

The structures that remain, as well as historic fishing gear that remains on-site, detract from the undeveloped quality of wilderness. The structures are somewhat visible from

the water (non-wilderness) which surrounds the compound on three sides, and their appearance is not obscured by vegetation. The structures do have limited impacts on the solitude quality of wilderness character as they are not easily viewed from within wilderness. The Johnson-Anderson Fishery is only accessible by water and is remote. Future visitors to this site would likely be seeking experiences associated with the historic qualities of the Isle Royale Wilderness, further limiting impacts to the solitude quality of wilderness character.

The Johnson-Anderson Fishery contributes to the fifth quality of wilderness character – other features of value. The Fishery has high integrity as a representative small fishing camp on the north shore of the island. The Anderson family was one of the first fishing families in Tobin Harbor before moving to Johnson Island. Anderson was also a master carpenter. While some of the representational structures (two fish houses) are gone, the camp retains integrity with the four historic structures remaining. Many of the structures maintain a clear relation to the water and reflect a spatial organization typical of fisheries, with utilitarian buildings near the shore and residences farther inland.

Conclusion: The Johnson-Anderson Fishery is necessary to convey the robust fishing values and significance of the Isle Royale Wilderness. As a fishery resource it is also a fundamental resource for the park. All structures that remain on-site are in good condition and retain high historic integrity. The Anderson Fishery is particularly significant for the assortment of historic fishing gear that survives on-site, such as fishing nets and floats and for the continued understanding of how people historically interacted with wilderness at Isle Royale. Thus, the structures are necessary to preserve the historic values of the Isle Royale Wilderness.

1.7.8 Other Areas

1.7.8.1 Anderson and Scotland Residence

The Anderson and Scotland Residence on the southwest end of Amygdaloid Island was once a part of a larger fishery and camp operated by Andrew Anderson and Conrad Scotland starting ca. 1910-1912 and continuing into the 1950s. The residence and a former net house (modified and now used for storage) are the only two remaining structures from the fishery. Although the surrounding cultural landscape is significantly diminished, the residence retains a high degree of integrity. It is individually eligible for the National Register under criteria A and C, with a period of significance from 1910 to 1912. As a fishery resource, the structure is also a fundamental resource to the park. The net house is not historic and will be evaluated in a separate MRA.



Anderson/Scotland Residence

During the 1970s–2000s, the Anderson and Scotland Residence was used as the Isle Royale north shore ranger station and ranger residence. The ranger station was the only ranger presence along the entire north shore of the island. It is now used administratively as temporary housing for visiting researchers conducting work on Lake Superior waters and within Isle Royale wilderness. The building is a 1-story, 3-room, nearly square plan structure with a hipped roof and wall gable over a centered front door.

The Anderson and Scotland Residence is considered a development and thus detracts from the undeveloped quality of wilderness. The residence is highly visible from the water (non-wilderness), but not very visible from within wilderness. It is located on an island and is not accessible by trail. Any future visitors to this site would likely be seeking experiences associated with the historic qualities of the Isle Royale Wilderness, further limiting its impacts on the solitude quality of wilderness character.

The Anderson and Scotland Residence contributes to the fifth quality of wilderness character – other features of value. The residence has integrity both as a former fishery residence and as a ranger station and residence. It represents wilderness adaptability and the transition from fishing to NPS use as a remote ranger station.

Conclusion: The Anderson and Scotland Residence is necessary to convey the history and culture of fishing and administering the park from a remote north shore ranger station. The necessity of Anderson and Scotland Residence for administrative use will be evaluated in a separate MRA. The structure is in good condition and retains high historic integrity.

1.7.8.2 Davidson House

Erik Johnson started the small-scale Tourist’s Home Resort in 1902 on what was then known as Johnson Island (now Davidson Island). Johnson’s resort had a large dock, main house, dining house, and several sleeping cottages. In the 1910s, Johnson sold the resort to the Davidson family of St. Paul, who built the present “Davidson House” using professionally designed architectural plans house ca. 1922. Many of the small resort cottages on the property when the

Davidsons purchased the property in 1922 were bought and moved to Tobin’s Harbor Resort (the Minong Lodge) to be used as sleeping cabins. Only the Davidson House remains.

The Davidson House is unique on Isle Royale, where the majority of private recreational structures were small, one-story frame cabins with unfinished interiors, like the cabins in Tobin Harbor for example. The Davidson House is far more elaborate and was designed by an architect. It is a two-story, gabled structure with flared eaves. Urban in appearance, it has Colonial Revival styling and shows Revivalesque influences. It has a stone foundation and an asphalt shingle roof. Measuring approximately 65’ by 27’, it is the largest historic residential structure on the island.

Davidson House has been used administratively by the NPS since the 1950s. Dr. Clay lived at Davidson and provided doctor-in-residence services for park visitors and staff. It has also been used as park housing for park staff and their families. Since the 1980s, Davidson has served as the Boreal Research station, providing housing and research space for scientists and technicians to conduct wilderness research. The station has accreted several modern structures and installations including a rustic lab, bunkhouse, generator house, pump house, and solar panel array. Since they are non-historic, they will be analyzed in a separate MRA.



Davidson House

Davidson House contributes to the fifth quality of wilderness character – other features of values. The Davidson House is in good condition and significant due to its integrity, uniqueness of design and scale, and as an example of a small family fishery that evolved into a resort and then into a private wilderness camp.

Davidson House detracts from the undeveloped quality of wilderness. Although obscured by vegetation on three sides, the residence is highly visible from the water (non-wilderness), particularly because of its scale and location in the heavily traveled Rock Harbor channel. It is somewhat visible within wilderness areas, particularly by hikers on the Rock Harbor trail between Rock Harbor and Three Mile campground, thus impacting the solitude quality of wilderness character. The structure is in very close in proximity to a major non-wilderness entry port for visitation at Rock Harbor and this diminishes somewhat the opportunity for solitude to this nearby wilderness area.

Conclusion: The Davidson House is necessary to convey early tourism of Isle Royale and the transition from a fishing economy to a tourism economy. The Davidson House is in good condition and retains high historic integrity. It is particularly significant for integrity, uniqueness of design and scale, as an example of fishery that evolved into a resort camp, and for its administrative importance as housing and research base for wilderness research. The necessity of Davidson House for administrative use will be evaluated through a separate MRA.

1.7.8.3 Island Mine Powder House Ruin and Hoist Engine

The Island Mine Powder House was constructed on Senter Point, and the relic hoist engine was installed inland at the mining site in 1874–1875. The powder house is built of native sandstone

using an irregular coursing masonry method, and is currently a ruin. It is 40' by 20'8", and the roof has collapsed, but portions of four walls remain standing and it is currently a ruin. The north wall is 12' tall and once hosted the building's only door. The original cast iron frame lies in the doorway (door was extant in 1960s). The Powder House Ruin has large corner stones and the interior walls that consist of a rough, untooled mortar finishing. The hoist engine consists of an intact iron boiler with attached hoisting apparatus. The device rests within the footprint of a previously enclosed structure, which has since fully decayed. Despite its age, the hoist is in remarkable condition with minimal rust.

Isle Royale experienced three mining eras beginning in 1843 and ending in 1893. Spurred by the success of the mining ventures on the mainland, during the nation's copper rush that peaked between 1844 and 1847, mining camps began to appear on Isle Royale. By 1847 eleven distinct mining ventures were present, many of which expanded operations to more than one site. One of these ventures focused on the Siskiwit Bay location and formed the Island Mine Company, which began operations in 1873. The prosperity of the mine established a small town, the island's most densely populated village. Operations were halted by the fall of 1875. The Island Mine Company faced difficulties that year. Their docks and stamp mill burned, the promising veins turned out to be a "bunchy", meaning that the copper was not evenly distributed through the ore belt, and copper prices declined. Although the Island Mine historic mining landscape is extensive, standing infrastructure is limited to the Powder House and Hoist Engine. The remainder of the landscape and related features is considered an archeological district.

The Powder House Ruin and the hoist engine minimally detract from the undeveloped quality of wilderness. Clearly the product of human construction, the ruins have been reduced to mostly natural materials (the stone walls and foundation) and are not maintained for any obvious functionality. Recently, the NPS capped the walls with a masonry compound as an erosion preventive. The masonry mixture followed a historic formula and was applied using hand tools only. The powder house is accessible via a short cross-country hike from a popular hiking trail that crosses the Senter Point peninsula. The hoist engine is also accessible from the hiking trail. The ruins and hoist engine could impact the opportunity for solitude for wilderness visitors. However, future visitors to this site would likely be seeking experiences associated with the historic qualities of the Isle Royale wilderness.

The Powder House Ruin and Hoist Engine contribute substantially to the fifth quality of wilderness character – other features of value. The Powder House Ruin is the oldest standing resource in the park associated with historic mining. Together with the hoist engine, these two features provide rare and tangible above-ground evidence of 1870s mining operations in the park. The hoist engine survived salvage and/or scrapping due to the island's remoteness and is the only remaining steam engine from the island's extensive mining history. Additionally, both are considered fundamental resources of the park.

Conclusion: The Powder House Ruin and Hoist Engine are necessary to convey the mining history that occurred at Isle Royale. The Powder House and Hoist Engine provide rare and tangible above-ground evidence of 1870s mining operations in the park, and as such contribute to a fundamental resource. Their significance is tied to their location within wilderness.



Powder House Ruin and Steam Hoist Engine

1.7.8.4 Holger Johnson Fishery and Resort

Chippewa Harbor has been the site of commercial fisheries since the 1880s. The first fisherman to set up here was Godfrey Vodrey. Sam Johnson and his nephew Holger Johnson eventually fished here. The latter took residence about 1910 and fished into the 1950s. He operated a small resort in the 1930s. By 1940, at least 16 structures were present in Chippewa Harbor. Today only one structure, a cabin, remains extant; the others were removed after the Johnson family stopped fishing in the late-1950s. The single structure, having lost its context with the remainder of the fishery complex, is not eligible for the National Register. However, as component of a historic fishery, it is considered a fundamental resource of the park.

The cabin is a one-story, one room made of logs, approximately 10' by 14', with an open porch along the front side facing the water. The roof of the cabin extends to cover the porch.

The cabin is considered a development and thus detracts from the undeveloped quality of wilderness character. The cabin is close to the shore but only minimally visible from the water because it is surrounded by dense vegetation. The cabin is also minimally visible from within wilderness limiting its impacts to the solitude quality of wilderness character. Although most visitors are unaware of the cabin, it can be accessed by a non-maintained social trail from the Chippewa Harbor campground. Wilderness visitors to this site would likely be seeking experiences associated with the historic qualities of the Isle Royale Wilderness.

The cabin contributes to the fifth quality of wilderness character—other features of value. The cabin at the Holger Johnson fishery is the only structure remaining at what was once a vibrant fishery and resort. Although the cabin is now in poor condition, as a fishery resource it remains a fundamental resource for the park.

Conclusion: The cabin at the Holger Johnson fishery was a rental cabin and not a structure that was used for the fishing operation and thus does not convey the history of the fishery that once existed on-site. It has low integrity and is in poor condition. Therefore, it is not necessary to convey the historic values of the Isle Royale Wilderness.

1.7.8.5 Horner Cottage

The Horner Cottage is located near the crest of a tall cliff at the northeast end of Horner Island. The property consists of a single cottage measuring 18' wide by 28' long. There are no other outbuildings and only crib ruins are noted in the water below. The cottage consists of vertical logs with a hipped roof covered in asphalt rolled roofing. The north and south elevations feature four sliding windows, each with a pair of 6-light windows. The east and west elevations feature French doors at each end. This is unusual among island cottages, and local knowledge suggests they were used to allow for wintering boats inside cottage following summer occupancy. If so, the boats would have to either be winched up a steep cliff or hauled up the shoulder of the adjacent ridgeline. The cabin is in poor condition; however, it is remarkable that it remains intact after so many decades of abandonment.

Detail on this property is scant, but the cabin was built for Charles Horner of Eaton Rapids, Michigan sometime during the early twentieth century. Land acquisition records show that Horner originally purchased the 35.5 acre island from Fred Schofield, owner of the Belle Isle Resort. Horner had family ties to the Horner Woolen Mills company in Eaton Rapids and had

passed away prior to federal purchase. For this reason, no life lease was taken, and the cabin was abandoned shortly after federal purchase.



Horner Cottage

The Horner Cottage is considered a development and thus detracts from the undeveloped quality of wilderness character. The cottage is only minimally visible from the water due to the surrounding thick vegetation. Visitors passing by on the water would have to be specifically looking for the cabin in order to see it. It is on an island with no trails and visitors to the site would be seeking to experience the historic quality of wilderness, which limits the impacts to the solitude quality of wilderness character.

The Horner Cottage contributes to the fifth quality of wilderness character – other features of value as one of the few examples of a small private family summer camp on the north shore of Isle Royale. The other remaining examples are from larger private resort compounds (Crystal Cove and Captain Kidd) or historic commercial fisheries.

Conclusion: The Horner Cottage contributes to the historic values of the Isle Royale Wilderness, but the cottage has lost integrity due to its poor condition. Thus, it is not necessary to convey the historic values of the Isle Royale Wilderness.

1.7.8.6 Johns Cabin

The historic Johns Cabin is a 16' by 16' one-story seasonal dwelling formed by a single room with a rectangular plan. It was constructed ca. 1888 and was originally used to store boats during the winter, which was facilitated by a six-foot removable panel cut from the south wall. The cabin served as an intermittent residence during the summer and was directly tied to fishing activities on Barnum Island, which is where the Johns family operated a fishery. The Johns Cabin was eventually repurposed as a residence after the family ceased fishing operations. At one point it was moved several yards inland, away from the shoreline. The cabin walls are clad in horizontal wood drop siding with corner boards, and the gabled roof is covered with asphalt roll roofing. The historic Johns Cabin is in fair condition and was determined individually eligible for listing in the National Register. However, cabin's appearance and integrity are marred by three modern structures (a cabin, shed, and privy) located immediately adjacent. These structures are not historic and thus their necessity is not evaluated here.

The Johns Cabin is considered a development and thus detracts from the undeveloped quality of wilderness character. The cabin is on a hill above a sheltered cove and not highly visible from the water (non-wilderness) unless in the cove below the cabin. It is also not highly visible within wilderness which limits impacts to solitude. Wilderness visitors would need to be on Johns Island to see it. If they were there, they would likely be seeking experiences associated with the historic qualities of the Isle Royale wilderness.



Johns Cabin

The Johns Cabin contributes to the fifth quality of wilderness character—other features of value, as a representation of a historic commercial fishery. This contribution is minimal due to the condition of the structure and low integrity of the site.

Conclusion: The Johns Cabin is not necessary for the administration of the area as wilderness. The cabin does contribute to the significance of Barnum Island area which is in non-wilderness but is not needed to convey the details of the history of that location.

1.7.8.7 West Caribou Island Fog Horn Compressor Shack

The West Caribou Island Fog Horn Compressor Shack and associated historic installations are located near the southwestern extremity of West Caribou Island. The shack measures approximately 16' by 6' and features wood siding, a rear window, and a fiberglass roof. A large compressor engine is located within and is now dysfunctional. The compressor powered a fog horn that was situated on a cliff approximately 40' farther to the west. The fog horn was removed many years ago; however, small concrete footings remain extant on top of the cliff. Separately, the remains of a small concrete boat siding is located in a narrow cove immediately north of the fog horn location. Details on the fog horn infrastructure are scant, but the horn may have been installed by NPS as early as the 1940s when West Caribou Island served as a temporary administrative facility. The fog horn was used to guide incoming NPS vessels that did not have radar capabilities. Although the fog horn apparatus was probably removed sometime in the 1970s, reasons for leaving the compressor shack remain unknown. Although the compressor shack and fog horn installation have yet to be formally evaluated for National Register eligibility, the NPS does not believe it retains enough integrity or significance to justify preservation or stabilization.

The compressor shack and related installations are considered developments that detract from the undeveloped quality of wilderness character. The compressor shack is situated away from the shore and not visible from the water. The fog signal poured concrete pad and footings and the concrete boat siding are visible from shore but are covered with lichens and are only minimally noticeable, thus limiting the impacts to the solitude quality. The building and installations are visible to wilderness visitors who are seeking to find them. They are adjacent to a campground and could be easily discovered by visitors exploring the area around the campground. The shack and installations are on an island and not on the park trail system.

The compressor shack and related installations contribute to the fifth quality of wilderness character – other features of value. However due to their poor condition and low integrity, this contribution is minimal.

Conclusion: West Caribou Island Fog Horn Compressor Shack and related historic installations do not retain enough integrity to convey any significance for their association with early NPS administration of the island. Thus, they are not necessary to convey the historic values of the Isle Royale Wilderness.

1.7.9 Fire Towers

Three fire towers were constructed the after the park was established during the NPS Mission 66 initiative. The Feldtmann, Ishpeming, and Ojibway Fire Towers are located along the Greenstone and Feldtmann ridgelines and were constructed in the early 1960s to replace earlier wooden fire towers erected by the CCC. Each tower is constructed of galvanized metal framing with an enclosed watch room/residence at the peak. The Feldtmann and Ojibway Fire Towers are approximately 50’ tall, while the Ishpeming tower is approximately 25’ tall. Manned service was discontinued in the mid-1980s. The Ojibway Fire Tower is now used as a communications tower with a radio and a modest array of antennae and research equipment mounted above and below the catwalk. The necessity of the Ojibway Fire Tower for administrative purposes will be assessed in a separate MRA.

Each of the towers were effectively mothballed following conclusion of fire watches. The Ishpeming and Feldtmann Fire Towers were listed in the National Register on January 5, 2021, and the Ojibway Fire Tower was listed in the National Register on April 9, 2021, as part of the Isle Royale National Park Fire Towers multiple property submission (NPS 2021a,b,c).

The Ojibway, Ishpeming, Feldtmann Fire Towers are developments that detract from the undeveloped quality of wilderness character. The Ojibway and Feldtmann Fire Towers are visible from many miles away and from multiple vantage points due to significant heights along open ridgelines. The Ishpeming Fire Tower is approximately half the height of the other two towers and is now well below the surrounding forest canopy. As such, visitors often do not see this tower until they are standing within 50’ of it. Though the visibility of these structures detracts from the solitude quality of wilderness, the open ridges were integral to the placement of these towers, which required a commanding view of the surrounding landscape for the purpose of identifying wildfires.



Mt. Ojibway Fire



Feldtmann Fire Tower



Ishpeming Fire
Tower

The Ojibway and Feldtmann Fire Towers are in good condition. The Ishpeming Fire Tower is in fair condition. All three contribute to the fifth quality of wilderness character – other features of value. The visibility of these resources, and vistas viewable from them, is a large part of their historic significance. The tower sites are accessible by popular trails and impact the opportunity for solitude for wilderness visitors. However, future visitors to these sites would likely be seeking experiences associated with the historic qualities of the Isle Royale wilderness, thus limiting the impacts on the solitude quality of wilderness character.

Conclusion: The Ojibway and Feldtmann Fire Towers are necessary for to preserve the historic values of the Isle Royale Wilderness since they are the best representative resources with highest integrity that can convey the park’s fire tower history. Their location within wilderness and views are integral to their historic significance. The Ishpeming Fire Tower contributes to the park’s wilderness character, but has low integrity due to vegetation overgrowth and its condition is now regarded as fair. Given the existence of similar fire tower resources of higher integrity, the Ishpeming Fire Tower is not necessary to convey the historic values of the Isle Royale Wilderness. The necessity of the fire towers for administrative use will be evaluated in a separate MRA.

1.8 TREATMENT

Reference Manual 41 counsels that in considering whether to perpetuate a structure in wilderness, its cultural or historic value and ability to convey the historical values of the wilderness should be considered. Virtually all structures considered in this process have been determined eligible for, or listed in, the National Register of Historic Places, though some unevaluated structures that are more than fifty years old have also been included. The Tobin Harbor Historic District has been determined as nationally significant. Additionally, some historic structures may be determined necessary for administrative uses, even if they have not been determined necessary to preserve the historic values of the Isle Royale Wilderness.

Active preservation of historic structures determined necessary to convey the historic values of the Isle Royale Wilderness supports the public purpose of wilderness for historic use and education. Evidence of human interactions between the natural environment, including the complex influences each has had on the other, is well-preserved on Isle Royale and can range from subtle indications of cultural uses or alterations of the natural landscape. The park’s cultural resources in wilderness illustrate the difficulties of life on the island, human use of resources on the island, the adaptation of human visitors and residents to the maritime environment, and the fleeting nature of human intervention in wild lands. In other words, they help tell the stories of a period of significance. For the purposes of this document, the term “active preservation” refers to structures identified for preservation or stabilization.

In developing proposed treatments for these historic structures, the NPS considered the feasibility and extent of measures likely needed to actively perpetuate a resource in balance the significance of the cultural resource and the contribution it makes to wilderness character. The NPS considered input from Tribes and non-Tribal consulting parties, as well as subject matter experts in both wilderness and cultural resource preservation and will consider input received during public comment on the Wilderness Stewardship Plan and Draft EIS.

The four proposed treatments are described below. These treatments conform to guidance for managing historic structures and installations in wilderness provided in *Reference Manual 41: Wilderness Stewardship* (NPS 2022).

Preservation. Preservation is the act or process of applying the measures necessary to sustain the existing form, integrity, and materials of a historic property. Work, including preliminary measures to protect and stabilize the property, generally focuses on maintenance and repair of historic materials and features rather than extensive replacement or new construction. New exterior additions are not within the scope of this treatment. In limited cases, sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a preservation project. Regarding historic and prehistoric structures, a structure or cultural landscape would be preserved in its present condition.

If a structure or installation is identified for active preservation in wilderness, the NPS may remove vegetation around the historic structures in order to maintain the cultural landscapes associated with a historic district and for fire prevention. Vegetation would not be removed or manipulated beyond what is necessary for these purposes. In many cases the vegetation in these districts or camps have been continuously maintained by life-lease families for well over a century. In other districts, the NPS may remove vegetation that has built over time where the cultural landscape has not been maintained. In these areas, impacts to the untrammeled quality of wilderness would be greater than in areas where the cultural landscape has been maintained over time.

Stabilization. Stabilization is a one-time treatment that provides temporary protection for vacant historic structures to arrest deterioration and allow for potential future preservation efforts, should the resources and opportunities for preservation arise. Stabilization is defined as the act or process of applying measures designed to reestablish a weather resistant exterior and undertake a minimum level of preservation action necessary to retain the structural stability of historic property, while maintaining the essential form as it exists at present. Stabilization and its definition were deleted from the Secretary of the Interior's Standards for the Treatment of Historic Properties in 1995. In the context of this plan, however, and for the purposes of retaining the essential form of certain fundamental and other important cultural resources in the Isle Royale wilderness, stabilization is considered an appropriate treatment in some cases, but one that does not require in-depth studies such as historic structure reports or cultural landscape reports.

The NPS would evaluate the condition of stabilized structures over a six-year cycle to correspond to the timeline of updates required in the List of Classified Structures. During the six-year cycle after the completion of this plan, if a structure is in poor condition and no NPS resources or resources under a partnership program are available to bring it to fair or good condition, then the NPS would ensure documentation of the structure and it would be left to deteriorate. The NPS may continue to stabilize structures that are in fair or good condition without the assistance of a partner. Treatment and documentation processes for structures that are left to deteriorate would follow the "Molder" treatment description below.

During the six-year cycle, if the NPS enters a partnership program to preserve stabilized structures or installations in fair or good condition, then historic structures and installations could revert to a preservation treatment and be maintained in a weatherized state as long as the

partnership program keeps structures and installations in fair to good condition. The NPS would prioritize resources for the stabilization of historic structures or installations that are fundamental resources and values as defined in the park’s Foundation Document or that have been determined to be of national significance determined by National Register evaluations.

Molder. Moldering is defined as allowing natural deterioration to act upon historic structures or installations without benefit of human interference. Moldering would allow resource to transition into an archeological site or ruin, facilitating future self-discovery by visitors (discovery site), research, and interpretive opportunities. Environmental contaminants posing a threat to visitor safety may be removed. Moldered structures would be recorded to Historic American Buildings Survey / Historic American Engineering Record / Historic American Landscape Survey standards and their condition would be monitored, but no effort would be made to maintain the resources or provide or maintain access to them.

Remove. Removal is defined as the careful and comprehensive disassembly and removal of historic structures or installations such that the site no longer retains its character, historical significance, and/or integrity. In the Wilderness Stewardship Plan/EIS “removal” is used to mean the equivalent of “demolition,” which is the term used for this process in *Reference Manual 41: Wilderness Stewardship* (NPS 2022). In the Isle Royale Wilderness, historic structures in poor condition, less significant to historic districts, or more intrusive to non-historic wilderness values would be proposed for removal. A recordation (as defined in “Molder”) would be conducted before proceeding with removal. Disturbance or loss of significant archeological resources on unexcavated archaeological sites would be avoided, minimized, or mitigated by data recovery, recognizing that it is preferable to preserve archeological sites in situ rather than to excavate them. Archeological sites can be avoided such as by leaving foundations or a chimney in place.

The tables below, *Tables 2-10*, represents the proposed actions for treatment of historic structures under Alternative B, identified as the NPS’s preferred alternative in the Wilderness Stewardship Plan/EIS.

Table 2. Proposed Treatment of Historic Structures (Alternative B) at Tobin Harbor.

| Tobin Harbor Historic District | | |
|--------------------------------|---------------------------------|---------------------------|
| Location | Camp Structures | Treatment (Alternative B) |
| Beard Camp | Cottage | Preservation |
| | Storage Building | Stabilization |
| Edwards Camp | Cabin | Preservation |
| | Store House and Outdoor Kitchen | Preservation |
| | Gem Island Cabin | Stabilization |
| | Dining Room | Preservation |
| | Privy | Preservation |
| Connolly Camp | Cabin | Preservation |
| | Privy | Stabilization |
| | Guest House | Stabilization |
| Dassler Camp | Cottage | Preservation |
| | Privy | Preservation |
| | Guest House | Preservation |
| | Boat House | Preservation |
| Gale Camp | Cottage | Preservation |
| | Privy | Stabilization |
| | Guest Cottage | Stabilization |

| Tobin Harbor Historic District | | |
|---------------------------------------|--------------------------------|----------------------------------|
| Location | Camp Structures | Treatment (Alternative B) |
| | Tool Shed | Stabilization |
| How Camp | Cabin | Stabilization |
| | Guest Cabin | Stabilization |
| Kemmer Camp | Guest Cabin | Preservation |
| | Residence | Preservation |
| | Steps | Molder |
| | Boat House | Preservation |
| | Privy | Stabilization |
| | Store House | Preservation |
| Mattson Fishery Camp | Cottage | Preservation |
| | Privy | Stabilization |
| | Fish House | Molder |
| | Mattson/Anderson Fishery Cabin | Molder |
| | Fishing Shed | Stabilization |
| | Storage Building | Preservation |
| Merritt Camp | Net House | Molder |
| | Cottage | Preservation |
| | Deer House | Preservation |
| | Privy | Preservation |
| | The Parsonage | Preservation |
| | Moose Manor | Preservation |
| Minong Island Lodge | Woodshed | Preservation |
| | Post Office | Preservation |
| Siefert Camp | Cabin | Molder |
| | Cottage | Preservation |
| | Privy | Stabilization |
| Snell Camp | Storage Building | Stabilization |
| | Cottage | Preservation |
| | Store House | Stabilization |
| | Guest House | Stabilization |
| Stack Camp | Writing Shack | Stabilization |
| | Cottage | Preservation |
| | West Privy | Preservation |
| | Guest Cottage | Preservation |
| | Retaining Wall | Stabilization |

Table 3. Proposed Treatment of Historic Structures (Alternative B) at Fisherman's Home Cultural Landscape.

| Fisherman's Home Cultural Landscape | |
|--|----------------------------------|
| Structure | Treatment (Alternative B) |
| Main Residence | Preservation |
| Fish House | Preservation |
| Store Room | Preservation |
| Help Quarters #1 | Preservation |
| Help Quarters #2 | Preservation |
| Dry-Laid Stone Wall | Preservation |
| Privy | Preservation |
| Smoker | Preservation |
| Tool Shed | Preservation |
| Guest Cabin | Preservation |

| | |
|-----------|--------------|
| Net House | Preservation |
|-----------|--------------|

Table 4. Proposed Treatment of Historic Structures (Alternative B) at Crystal Cove.

| Crystal Cove Cultural Landscape | |
|---------------------------------|---------------------------|
| Structure | Treatment (Alternative B) |
| Main Lodge | Preservation |
| Guest Cabin #1 | Preservation |
| Guest Cabin #2 | Preservation |
| Residence | Preservation |
| Boardwalk | Molder |
| Fuel Shed Ruin | Molder |
| Generator House | Removal |
| Smokehouse | Removal |
| Storage Shed | Molder |

Table 5. Proposed Treatment of Historic Structures (Alternative B) at Captain Kidd Cultural Landscape.

| Captain Kidd Cultural Landscape | |
|---------------------------------|---------------------------|
| Structure | Treatment (Alternative B) |
| McPherran Cabin | Stabilization |
| Bath House | Molder |
| Boat House | Molder |
| Flagpole | Molder |
| Tool Shed | Molder |
| Sleeping Cabin #1 | Molder |
| Sleeping Cabin #2 | Molder |
| Sleeping Cabin #3 | Molder |

Table 6. Proposed Treatment of Historic Structures (Alternative B) at Wright Island Area.

| Wright Island Area | |
|--------------------|---------------------------|
| Structure | Treatment (Alternative B) |
| Main Cabin | Removal |
| Mike Johnson Cabin | Removal |
| Privy | Removal |

Table 7. Proposed Treatment of Historic Structures (Alternative B) at Bangsund Fishery.

| Bangsund Fishery | |
|-------------------|---------------------------|
| Structure | Treatment (Alternative B) |
| Main Residence | Preservation |
| Sleeping Cabin #1 | Stabilization |
| Sleeping Cabin #2 | Stabilization |

Table 8. Proposed Treatment of Historic Structures (Alternative B) at Johnson-Anderson Fishery.

| Johnson-Anderson Fishery | |
|-------------------------------|---------------------------|
| Structure | Treatment (Alternative B) |
| Main Cottage and Log Sleeping | Preservation |

| | |
|------------------------|---------------|
| Area | |
| Privy | Preservation |
| Herman Johnson Cottage | Stabilization |
| John Anderson Cottage | Stabilization |

Table 9. Proposed Treatment of Historic Structures (Alternative B) at Other Areas.

| Other Areas | |
|--|---------------------------|
| Structure | Treatment (Alternative B) |
| Anderson and Scotland Residence | Preservation |
| Davidson House | Preservation |
| Island Mine Powder House Ruin and Hoist Engine | Preservation |
| Holger Johnson Fishery and Resort | Molder |
| Horner Cottage | Molder |
| Johns Cabin | Removal |
| West Caribou Island Foghorn Compressor Shack and associated historic installations | Removal |

Table 10. Proposed Treatment of Historic Structures (Alternative B) at the Fire Towers.

| Fire Towers | |
|-------------|---------------------------|
| Structure | Treatment (Alternative B) |
| Ishpeming | Preservation |
| Mt. Ojibway | Preservation |
| Feldtmann | Molder |

2.0 STEP TWO

Step Two will be completed after the proposed treatments for historic structures has been subject to public review in the plan/EIS process. This step will include evaluating alternatives to determine the methods or tools needed to achieve proposed treatments with the least impact to wilderness character.

APPENDIX D: ISLE ROYALE NATIONAL PARK WILDERNESS RESEARCH STRATEGY

Research in Isle Royale National Park Wilderness

Isle Royale National Park (Isle Royale or the Park) serves as an important resource for long-term research into and study and observation of ecological processes in an island environment. The Park recognizes that appropriate scientific activities may be critical to the long-term preservation of wilderness. The park's mission states that the park contributes to knowledge about natural and cultural resources and associated values; management decisions about resources and visitors are based on adequate scholarly and scientific information. Therefore, appropriate scientific activities are supported in wilderness.

Isle Royale National Park provides a unique, natural laboratory for ecological and environmental studies. Because of its isolation and lack of recent human manipulation of the landscape and park waters, studies can be performed in the Park that can be done nowhere else. The Park provides a baseline for recognizing and quantifying the impacts of global environmental change, on climate, on environmental chemistry, and on biodiversity. With limited species diversity and few exotic species, the Park is an ideal laboratory in which to apply systems ecology to ascertain the mechanisms controlling the diversity and stability of natural landscapes and its inhabitants.

Research Priorities at Isle Royale National Park

In August of 2008, the Park and Isle Royale Institute of Houghton, Michigan representatives formed a committee of scientists to visit the park and draft a 10-year strategic plan for the park's research priorities (Schlesinger et al. 2009). The committee identified key future research that would contribute toward development of a more complete functional understanding of Isle Royale as an ecosystem. A list of 10 questions that build on the foundation of research and represent key opportunities for new research were developed:

- What explains the spatial and temporal dynamics of vegetation on Isle Royale?
- What are the implications of shorter/milder winters on the biota of Isle Royale and on ecosystem processes such as primary production and nutrient cycling?
- What are the implications of its isolated location for trends in biodiversity on Isle Royale?
- What are the consequences of human-wildlife interactions for both the visitors and the wildlife populations? How can the synergy between a good research program and the visitor experience be enhanced?
- How do trophic dynamics, especially moose herbivory and loon feeding, affect aquatic ecosystems?
- How does water flow through the Isle Royale ecosystem, and how does hydrology act as a master variable for both the terrestrial and aquatic ecosystems?
- What is the biogeochemistry of mercury on the island?
- How do changing amounts and sources of nitrogen (N) affect Isle Royale ecosystems? How are "sentinel species" changing, and what factors drive changes in the presence or abundance of these key species?

- How will changes in the abundance of pests and pathogens cascade through the Isle Royale ecosystem?

Process for Review of Special Use Permit for Research and Scientific Activities

1. Applicant submits required information to Park via the on-line National Park Service (NPS) Research Permit and Reporting System (see Part A).
2. Park reviews proposal (see Part B).
3. Park may contact applicant to discuss potential actions or processes that may reduce or avoid impacts to wilderness character or address other concerns (see Part B).
4. Park completes required compliance for scientific research and collection permit (see Part C).
5. Permit issued, cancelled or denied (see Part D).

A. Submitting Research and Scientific Study Applications

Researchers must submit applications through the NPS Research Permit and Reporting System at <https://irma.nps.gov/rprs/>. Researchers are encouraged to submit applications at least 90 days prior to the start of proposed activities in the parks. Permits are issued on a calendar-year basis and must be renewed annually. The application should include a more detailed study proposal if one has not been submitted in a previous year. The application should consider general and park specific conditions for research.

B. Considerations for Approval

Consistent with NPS *Management Policies 2006*, Isle Royale supports appropriate scientific activities in wilderness. Scientific activities that involve potential impacts to wilderness character, may be allowed when the benefits of what can be learned outweigh the impacts on wilderness values and resources. New technology and techniques will be encouraged if they are less intrusive and cause less impact than their predecessors.

B.1. When evaluating proposals NPS will consider:

- beneficial impacts to wilderness character;
- scientific merit of the proposal the researcher's experience related to the proposed activities;
- adverse impacts to wilderness character, including whether the proposed activity pose additional impact in an area that already has an unacceptable level of cumulative impacts or is close to an unacceptable level of cumulative impacts; including,
 - whether the proposed activity pose consultation issues over listed species or cultural resources;
 - whether proposed activity requires collecting plants or other natural resources (if research includes collection of samples, stewardship of the samples if they are not destroyed in the analysis must meet NPS Curatorial standards), handling or removing animals, or introducing plants or animals into the wilderness;
 - whether the proposed activity pose timing or location problems, such as occurring in a sensitive area or time for particular species;

- whether the proposal redundant to previous or ongoing research—that is, has the proposed research already been done at the same site, asking the same question with similar methodology by previous researcher;
- if the submitter has conducted work in the area before, were there any problems with completing administrative requirements (such as submitting reports, removing installations and other debris from the activity, or completing curatorial and specimen documentation requirements) in a timely and professional manner?
- legal or policy concerns; and
- whether the proposed activities interfere with management operations on or off the island.

Additionally, if the proposal involves specimen collection, and the material is to be stored or archived, the research must agree to store and steward these collections to NPS standards (See General and Park Specific Permit Conditions)

Based on the considerations above, NPS may recommend potential actions or conditions that should be included in the permit to reduce adverse impacts to wilderness character or address the concerns above.

B.2. Scientific activities involving prohibitions identified in section 4(c) of the *Wilderness Act* (16 USC 1133(c)) may be conducted within wilderness when the following occur:

- The desired information is essential for the understanding health, management, or administration of wilderness, and the project cannot be reasonably modified to eliminate or reduce the nonconforming wilderness use(s); or
- The scientific activities increase scientific knowledge, even when this serves no immediate wilderness management purposes, provided it does not compromise wilderness resources or character.

The preservation of wilderness resources and character will be given significantly more weight than economic efficiency and/or convenience.

Research and monitoring devices (e.g., video cameras, data loggers, meteorological stations) may be installed and operated in wilderness if the desired information is essential for the administration and preservation of wilderness and cannot be obtained from a location outside wilderness without significant loss of precision and applicability and the proposed device is the minimum requirement necessary to accomplish the research objective safely.

C. Compliance

Compliance with the *National Environmental Policy Act* (including completion of documented categorical exclusions, environmental assessments/finding of no significant impact, or environmental impact statements/records of decision) and other regulatory compliance (including compliance with section 106 of the *National Historic Preservation Act* (16 USC 470f), state or federal permits, IACUC) will be completed as appropriate before a permit is issued.

Documentation of compliance with the Minimum Requirement Concept will be appended to the Categorical Exclusion, Finding of No Significant Impact or Record of Decision associated with the permit.

D. Permit Issued, Cancelled or Denied

The superintendent has ultimate decision authority, which can be delegated, to approve or deny research and collecting permits. Research may be denied for a variety of reasons, such as but not limited to (1) the impact to resources or the visitor experience is too high; (2) the benefit does not justify the level of impact; (3) the research is not deemed necessary to occur in wilderness (and a site outside wilderness is not identified); (4) the researcher does not agree to the minimum activity required to accomplish the research; or (5) the research is considered too risky in terms of safety. Additionally, a research application may be cancelled if the applicant fails to provide adequate information to allow a thorough review.

The NPS reviewer transmits the decision to the researcher via email. If the application is approved, a permit, including required conditions and supplementary materials, will be attached to the email. If an application is cancelled or denied, a researcher may start the process over by submitting a new (revised) application to the Research Permit and Reporting System. It is recommended that researchers discuss required changes with the science coordinator before submitting a new application.

If the research is approved, the researcher must sign and date the permit and return a copy to the park's science coordinator.

E. Monitoring Research Activities

Park managers will monitor permitted activities to ensure that they remain compliant with wilderness policy. Researchers will be informed of their duties to adhere to wilderness policies once their projects have been approved. Researchers should notify park managers of any alterations to original plans. Any change to the approved project must be evaluated and approved by the park manager in writing before they are implemented. Methodologies for all long-term projects will be reviewed on a regular basis to determine if techniques are available that are more compatible with maintaining wilderness character.

Park managers will ensure that agreed upon removal of temporary, nonconforming items will be completed.



APPENDIX E: GENERAL CONDITIONS FOR SCIENTIFIC RESEARCH AND COLLECTING PERMIT

United States Department of the Interior National Park Service

1. **Authority** - The permittee is granted privileges covered under this permit subject to the supervision of the superintendent or a designee and shall comply with all applicable laws and regulations of the National Park System area and other federal and state laws. A National Park Service (NPS) representative may accompany the permittee in the field to ensure compliance with regulations.
2. **Responsibility** - The permittee is responsible for ensuring that all persons working on the project adhere to permit conditions and applicable NPS regulations.
3. **False information** - The permittee is prohibited from giving false information that is used to issue this permit. To do so will be considered a breach of conditions and be grounds for revocation of this permit and other applicable penalties.
4. **Assignment** - This permit may not be transferred or assigned. Additional investigators and field assistants are to be coordinated by the person(s) named in the permit and should carry a copy of the permit while they are working in the park. The principal investigator shall notify the park's Research and Collecting Permit Office when there are desired changes in the approved study protocols or methods, changes in the affiliation or status of the principal investigator, or modification of the name of any project member.
5. **Revocation** - This permit may be terminated for breach of any condition. The permittee may consult with the appropriate NPS Regional Science Advisor to clarify issues resulting in a revoked permit and the potential for reinstatement by the park superintendent or a designee.
6. **Collection of specimens (including materials)** - No specimens (including materials) may be collected unless authorized on the Scientific Research and Collecting permit.

The general conditions for specimen collections are:

- Collection of archeological materials without a valid Federal Archeology Permit is prohibited.
- Collection of federally listed threatened or endangered species without a valid U.S. Fish and Wildlife Service endangered species permit is prohibited.
- Collection methods shall not attract undue attention or cause unapproved damage, depletion, or disturbance to the environment and other park resources, such as historic sites.
- New specimens must be reported to the NPS annually or more frequently if required by the park issuing the permit. Minimum information for annual reporting includes specimen classification, number of specimens collected, location collected, specimen status (e.g., herbarium sheet, preserved in alcohol/formalin, tanned and mounted, dried and boxed, etc.), and current location.

- Collected specimens that are not consumed in analysis or discarded after scientific analysis remain federal property. The NPS reserves the right to designate the repositories of all specimens removed from the park and to approve or restrict reassignment of specimens from one repository to another. Because specimens are federal property, they shall not be destroyed or discarded without prior NPS authorization.
 - Each specimen (or groups of specimens labeled as a group) that is retained permanently must bear NPS labels and must be accessioned and cataloged in the NPS National Catalog. Unless exempted by additional park-specific stipulations, the permittee will complete the labels and catalog records and will provide accession information. It is the permittee's responsibility to contact the park for cataloging instructions and specimen labels as well as instructions on repository designation for the specimens.
 - Collected specimens may be used for scientific or educational purposes only and shall be dedicated to public benefit and be accessible to the public in accordance with NPS policies and procedures.
 - Any specimens collected under this permit, any components of any specimens (including but not limited to natural organisms, enzymes or other bioactive molecules, genetic materials, or seeds), and research results derived from collected specimens are to be used for scientific or educational purposes only, and may not be used for commercial or other revenue-generating purposes unless the permittee has entered into a Cooperative Research And Development Agreement or other approved benefit-sharing agreement with the NPS. The sale of collected research specimens or other unauthorized transfers to third parties is prohibited. Furthermore, if the permittee sells or otherwise transfers collected specimens, any components thereof, or any products or research results developed from such specimens or their components without a Cooperative Research and Development Agreement or other approved benefit-sharing agreement with NPS, permittee will pay the NPS a royalty rate of twenty percent (20%) of gross revenue from such sales or other revenues. In addition to such royalty, the NPS may seek other damages to which the NPS may be entitled including but not limited to injunctive relief against the permittee.
7. **Reports** - The permittee is required to submit an Investigator's Annual Report and copies of final reports, publications, and other materials resulting from the study. Instructions for how and when to submit an annual report will be provided by NPS staff. Park research coordinators will analyze study proposals to determine whether copies of field notes, databases, maps, photos, and/or other materials may also be requested. The permittee is responsible for the content of reports and data provided to the NPS.
8. **Confidentiality** - The permittee agrees to keep the specific location of sensitive park resources confidential. Sensitive resources include threatened species, endangered species, and rare species, archeological sites, caves, fossil sites, minerals, commercially valuable resources, and sacred ceremonial sites.
9. **Methods of travel** - Travel within the park is restricted to only those methods that are available to the general public unless otherwise specified in additional stipulations associated with this permit.
10. **Other permits** - The permittee must obtain all other required permit(s) to conduct the specified project.

11. **Insurance** - If liability insurance is required by the NPS for this project, then documentation must be provided that it has been obtained and is current in all respects before this permit is considered valid.
12. **Mechanized equipment** - No use of mechanized equipment in designated, proposed, or potential wilderness areas is allowed unless authorized by the superintendent or a designee in additional specific conditions associated with this permit.
13. **NPS participation** - The permittee should not anticipate assistance from the NPS unless specific arrangements are made and documented in either an additional stipulation attached to this permit or in other separate written agreements.
14. **Permanent markers and field equipment** - The permittee is required to remove all markers or equipment from the field after the completion of the study or prior to the expiration date of this permit. The superintendent or a designee may modify this requirement through additional park specific conditions that may be attached to this permit. Additional conditions regarding the positioning and identification of markers and field equipment may be issued by staff at individual parks.
15. **Access to park and restricted areas** - Approval for any activity is contingent on the park being open and staffed for required operations. No entry into restricted areas is allowed unless authorized in additional park specific stipulations attached to this permit.
16. **Notification** - The permittee is required to contact the park's Research and Collecting Permit Office (or other offices if indicated in the stipulations associated with this permit) prior to initiating any fieldwork authorized by this permit. Ideally this contact should occur at least one week prior to the initial visit to the park.
17. **Expiration date** - Permits expire on the date listed. Nothing in this permit shall be construed as granting any exclusive research privileges or automatic right to continue, extend, or renew this or any other line of research under new permit(s).
18. **Other stipulations** - This permit includes by reference all stipulations listed in the application materials or in additional attachments to this permit provided by the superintendent or a designee. Breach of any of the terms of this permit will be grounds for revocation of this permit and denial of future permits.

APPENDIX F: PUBLIC COMMENTS RECEIVED DURING PUBLIC SCOPING

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 1

Author Information

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Correspondence Information

Status:Reviewed Park Correspondence Log:
Date Sent: Oct 21, 2022 Date Received: Oct 21, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Action A please. I have been many times and there is no need to destroy the history and structures that made IRNP what it is today.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 2

Author Information

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Status:Reviewed Park Correspondence Log:
Date Sent: Oct 22, 2022 Date Received: Oct 22, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I would favor option B but would like more exploration of a campground permit system outlined in Option C. I would oppose removing the shelters from campgrounds. Not sure what the definition is of removing commercial use within Isle Royale. Would like to see a map of wilderness areas to added.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 3

Author Information

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Status:Reviewed Park Correspondence Log:
Date Sent: Oct 23, 2022 Date Received: Oct 23, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Thank you for the opportunity to comment on the future of the wilderness experience at Isle Royale. My son and I visited in the summer of 2018 with our kayak. We camped in the established waterfront campsites and stayed in the lodge at Rock Harbor.

For us, the highlights were experiencing the rugged beauty of Lake Superior's shoreline from our human powered vessel, hiking the interior trails to enjoy the flora and views, and meeting the Peterson's working at the Bangslund Cabin.

On the other hand, the vacation structures previously owned by past private citizens had no real meaning for us. The use of the waterfront campsites by powerboaters seemed incongruous with the wilderness character of the island, but I can understand how private boaters would enjoy the experience in their own way as long as the noise of their engines and generators don't impede on the otherwise quiet environment. We didn't encounter any particularly large or noisy crowds once we left Rock Harbor.

As a regular user of wilderness areas around the country, I can appreciate the need to limit visitation. I strongly support a permit system similar to the BWCA which caps group sizes and requires permit holders to take online training prior to their visit. For casual visitors who simply want to stay in the lodge/cabins or day hike the trails, no permit should be needed. It's difficult and costly enough to simply get to the island. The existing trails system, I feel, is adequate and should be maintained as-is. Allowing bog bridges or other low profile manmade structures in the wilderness to reduce foot traffic impact should be encouraged.

In conclusion, I'm pleased to see an updated management plan for this incredible natural and historic resource is being carefully considered. As a primarily wilderness experience, nature should be

prioritized above humans. Interpreting the historic manmade relics of the native, mining, fishing and tourism phases of the island should be incorporated into the non-wilderness areas as much as possible. Policies to limit group size and minimize powerboat intrusion should be implemented.

Thank you for all you're doing to preserve these resources unimpaired for future generations.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 4

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Notes:

Correspondence Text

Having recently visited Isle Royale this past summer I wanted to stress the importance of keeping campsites first come first serve. We had an excellent experience during our July visit. This visit was likely only possible because we were able to visit without the advanced pre planning needed to visit many other parks. Visiting today's national parks now requires 6 months to a year of advanced planning and knowing your exact schedule down to the day a year in advance with the specific route you want to hike. All spontaneity if the wilderness experience and the American adventure has been removed. This trip was planned about three months in advance when it plans became clear for the summer. Most other National parks were completely booked and impossible to get sites. At Isle Royale we booked our ferry and that was it. I spent the next weeks researching and planning a trip to fit the days we had. On the Island we had a true adventure that included decisions about how far we wanted to hike each day. We had planned the trip but left options based on weather, how we were feeling and our supplies. We generally followed our plan and secured a shelter every day where they were available mostly by waking up early and keeping a nice pace. Due to not having reservations we were able to modify the end of our trip when weather became wet and avoided the more difficult Minong Ridge trail and hopped on the greenstone where we hiked as fast as we could. We had options on our hike based on how we were feeling. We could stop early and rest at Hatchet lake or keep hiking and push to S. Lake DeSor. We kept hiking. We did the same for Island mine and continued on to Windigo. However this level of flexibility in planning is critical in a wilderness. I was hiking with two children ages 8 and 12 and knowing we could try for a big day, but have a bail out option to split the day in two was huge. Keep Isle Royale wild and unpredictable by letting people keep the spontaneity of the trip. I would rather camp and share a site but have the flexibility of the experience than be stuck with rigid schedule based on reservations I booked more than 6 months ago.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 5

Author Information

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Correspondence Information

Status:Reviewed Park Correspondence Log:
Date Sent: Oct 23, 2022 Date Received: Oct 23, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Please seriously consider mandating some kind of limit on frequencies of small aircraft/sea planes as well as the number of operators allowed in the area. One seaplane company is more than enough. They create horrible noise throughout the day for months on end. It degrades the wilderness aspect of the park and rural areas of houghton-keweenaw. Until the planes are entirely electric they should have strict limits on hours of operation. They are obviously great money makers but the pristine, (nonhuman) element makes all parks and rural areas of beauty precious. Please do not trade noise pollution for a few dollars more. I heard Bryce national park will be offering 500 planes rides a year. This is the very worst of human nature-greed run amok to benefit the few rich affluent people who pays for such diversions. Protect what's important: the wilderness. Humans protect themselves enough. Do the right thing for what's precious and defenseless

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 6

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Status:Reviewed Park Correspondence Log:
Date Sent: Oct 23, 2022 Date Received: Oct 23, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

There are several parts to be carefully considered but most importantly is the impact of increase love of the park as it's popularity increases. Having been to the island three times with my young kids I can understand both of the importantace of making this experience available for all but to keep it protected will be extremely challenging . Also to be considered is the benefit brought to the mainland in additional commerce and some weight will likely be forced upon the NPS to open the floodgates. I believe that perhaps zoning could be one solution to protect sensitive areas while providing access to the great experience available. I am guessing a majority of visitors are day users and are naturally limited to a smaller area of the island. This area could define a area that is most likely to be disturbed by visiting guests. Investment in the day area zone maybe the most challenging. I view the act of making areas accessible by paving and such to be damaging in its own right. That said the day zone will likely need this kind of investment. The backwoods zones should be kept as rustic as possible. The day maybe coming when one has to apply for a backwoods certificate in order to access these sensitive areas.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 7

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Status:Reviewed Park Correspondence Log:
Date Sent: Oct 23, 2022 Date Received: Oct 23, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I prefer option A not changing user access. My second choice would be option b expand high use campgrounds. I don't like reducing public access to the park. Reservations will encourage people to cross the lake in less than ideal sea conditions and may trigger more need for rescue. I also think that the park is planning or at least leaning towards option b or why would the newly constructed restaurant at Windigo be allowed to be constructed.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 8

Author Information

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Status:Reviewed Park Correspondence Log:
Date Sent: Oct 24, 2022 Date Received: Oct 24, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I have been camping at our National Parks for over sixty years. I miss the early years when camp sites were readily available and parks were uncrowded, but I am pleased that so many more individuals and families have discovered the benefits of enjoying and exploring our national park system. I believe that we must limit access to some parks in order to protect them. We have to charge an entry fee in order to preserve and maintain them. I would like to see our parks remain open to all for free or at a minimum use fee, however, I believe this is unsustainable. Therefore, I am in favor of increasing fees as necessary and using a reservation system or lottery to limit overcrowding.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 9

Author Information

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Status:Reviewed Park Correspondence Log:
Date Sent: Oct 24, 2022 Date Received: Oct 24, 2022
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Notes:

Correspondence Text

I would love to see a campground reservation requirement.
When I was there in 2021, MacCargoe Cove campground was severely overcrowded.
Todd Harbor was overflowing.
We found ourselves rushing to Todd Harbor and Hatchett Lake to ensure we could get a site.
It would be much more pleasant to hike to a site knowing that a site was there for you upon arrival.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 10

Author Information

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Correspondence Information

Status:Reviewed Park Correspondence Log:
Date Sent: Oct 24, 2022 Date Received: Oct 24, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Hello!

I stumbled upon an article in the Detroit News, dated Oct. 22 which was written in regard to campground management in the park. This comment is in response to the issue of managing increased numbers of visitors.

I have backpacked sections Isle Royale on numerous occasions. I cannot personally attest to the issue of overpopulated campsites, as my trips are generally at the very beginning or very end of the season. But, apparently, there is a growing problem in need of mitigation.

I visit 3 to 4 National Parks a year. Creating a reservation system seems like a reasonable solution but, in my experience, is not. The system currently utilized by the National Parks is difficult to navigate. But the biggest issue appears to be no show guests.

I have visited several National Park campgrounds with signage stating the campground area is full. Having a reservation, I am able to find my site and set up. As my stay progresses, it becomes apparent the campground is anything but full. In one instance, Indiana Dunes National Lakeshore, about 80% of the campground was available! In my experience, this is not an uncommon occurrence. I am making an assumption that the problem is no-show campers. But I don't know why a park would claim a campground is full if the reservation system indicated otherwise. I can only imagine the number of potential park visitors unnecessarily turned away.

Also, if there is a problem with the reservation, there is no person to assist with the problem. Campground hosts are now utilized as managers but they are not always present, especially during the early and latter parts of the season. Visitor Center employees, in my experience, know virtually nothing

about campground operations.

I would suggest limiting the number of visitors to the island to capacity of the island and maintaining the first come/first served basis. This method would not be feasible in most parks. But since visitor numbers can be closely monitored in the case of Isle Royale, it would seem to be a reasonable solution.

I don't feel that creating more campgrounds and trails is a good solution. It doesn't solve the population management side of the equation. The visitor capacity of the island will quickly be met and the same discussion will come back to the table...probably sooner than later.

Thank you.
Cheryl Hofweber

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 11

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Status:Reviewed Park Correspondence Log:
Date Sent: Oct 24, 2022 Date Received: Oct 24, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I strongly support and appreciate this timely and important NPS planning work.

I deeply care about Isle Royale National Park and its impressive wilderness values.

I generally support the NPS proposed action but I think that Alternative C to increase solitude would be best. Solitude is an indispensable component of true wilderness.

To fully protect wilderness values, human land uses and group sizes should be kept to a minimum. When in any doubt, NPS should err on the side of protecting wilderness rather than capitulating to recreational demands.

I am gravely concerned with the climate and extinction crises. These crises are real, connected, rapidly getting worse, and require bold and innovative solutions. NPS should use this and all of its other planning processes to seek proposed actions that would advance these urgently needed solutions. For example, any building materials for restoration of historic structures should be from sustainable sources. Fossil fuel uses should be reduced and discouraged. Solar panels on the roofs of existing structures should be considered. Invasive species are harmful and should be promptly identified and eradicated before they can spread.

I commend NPS for this necessary work that I hope will be successful in protecting and restoring wilderness values.

Thank you very much for your consideration.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 12

Author Information

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Correspondence Information

Status:Reviewed Park Correspondence Log:
Date Sent: Oct 24, 2022 Date Received: Oct 24, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I am writing to recommend that the park pursue Alternative C. Wild places are rare and growing rarer, and ISRO is a unique, superlative wilderness.

Did the park consider decommissioning lodges and cabins under any alternatives? The water, wastewater, solid waste management, and diesel consumption associated with the lodging facilities negatively impacts the wilderness character of adjacent land and water resources.

Please protect wilderness to the maximum degree possible.

Thank you

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 13

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Status:Reviewed Park Correspondence Log:
Date Sent: Oct 24, 2022 Date Received: Oct 24, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I have wanted to come to Isle Royale for many years. I had begun planning a trip for fall of 2023, however after reading about the overcrowding at the campsites I have reconsidered this trip. I would support an alternative C or combination of B and C plan to be my preference. Preserving Wilderness Character should be the number one goal of these Wilderness areas, even if that means fewer people can visit per year. If visiting Isle Royale is to be a once in a lifetime experience, I want it to be of the highest quality possible.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 14

Author Information

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Correspondence Information

Status:Reviewed Park Correspondence Log:
Date Sent: Oct 24, 2022 Date Received: Oct 24, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Isle Royale National Park is such a unique area and has been one of my favorite places to visit. During my visit, I enjoyed the solitude I experienced and the feeling of being in a designated Wilderness. As an experienced hiker and backpacker it was relatively easy for me to explore and appreciate the Wilderness without leaving much impact on the environment around me, however, outdoor recreation is becoming more and more popular and not everyone is familiar with how to leave as little impact as possible in Wilderness areas such as Isle Royale. The preliminary alternatives seem to have some very good options, and I think alternative B has some very good components to it. Adding a campground and additional campsites will help individuals who are not experienced in primitive camping and additional hiking trails are good for inexperienced hikers who are not as familiar or comfortable in primitive settings. Adding the 81 acres of Wilderness will help to preserve more of this area. However, I am curious about the historical structures. It seems very broad and vague so I am wondering what structures you anticipate demolishing and which ones you think will be preserved. If alternative C is chosen what will the group sizes be reduced to, as the existing group size limit is already very small. I look forward to reading the EIS draft in the Spring.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 15

Author Information

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Correspondence Information

Status:Reviewed Park Correspondence Log:
Date Sent: Oct 26, 2022 Date Received: Oct 26, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I have been coming to Isle Royale since 1983. I have made 34 trips including volunteer work trips. I have taken part in the GMP, Backcountry and Wilderness Plan, Cultural Resources Plan, Fire Mgmnt Plan.

Alternative A is a moot point and does not address any of the raised issues. I would say for those truly seeking solitude, the off or shoulder seasons are the best on Isle Royale. There are plenty of opportunities for quiet and solitude if you know where to go.

I hope the Park will keep in my mind the flora and fauna and their existence should be put above all other concerns.

I advocate alternative B. Though I think there are sites on Isle Royale where additional shelters or tent sites could be added and trails. I think if the large crowds continue in July-august, a reservation system should be implemented so as not to overstress the Island during the busy times. I think the shelters and outhouses are a good thing for IR as the help cut down on impact that tent pads have and having no outhouses would lead to a mess!

I have dreamed of winter camping on IR. However, as stated elsewhere, I think the Island should be left to the fauna that are going through the most stressful time of the year. I doubt most folks have the requisite experience and gear to safely winter camp there. I assume access would be via planes with skis? If you are looking for beta testers for winter camping, please keep me in mind!

As for the historic structures, they are a part of Isle Royale as well as the fishing boats, and should be maintained. I was surprised that the Edison Fishery, Barnum, Washington and Grace Islands were not included in the areas to be included. I trust there will be a map or description of the added acres stated in both Alternatives B and C. .

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 16

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Correspondence Information

Status:Reviewed Park Correspondence Log:
Date Sent: Oct 26, 2022 Date Received: Oct 26, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

October 25, 2022

Superintendent, Denice Swanke
Isle Royale National Park
800 East Lakeshore Drive
Houghton, Michigan 49931-1896

Re: Requesting Extension of Comment Period for Wilderness Stewardship Plan

Dear Superintendent, Swanke,

On behalf of the National Parks Conservation Association (NPCA) we request the National Park Service provides a 60-day extension to the public comment deadline for the initial scoping period for the Environmental Impact Statement for the Isle Royale Wilderness Stewardship Plan. We believe that the current comment period of 30 days is inadequate for NPCA and others to understand and provide meaningful comments.

As the year end approaches, so do the holidays occurring between Thanksgiving and New Year's Day when time to devote to thoughtful review is interrupted or cut short. Extending the comment period by 60 days will provide the extra time necessary to fully understand the impact of the provisions and scope suggested in the Isle Royale National Park Wilderness Stewardship Plan.

We respectfully ask that you grant our request for an additional 60 days so we can be effective partners and weigh in with thoughtful comments.

Respectfully submitted,

Kira Davis
Great Lakes Senior Program Manager
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PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 17

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Correspondence Information

Status:Reviewed Park Correspondence Log:
Date Sent: Oct 26, 2022 Date Received: Oct 26, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Reducing or restricting visitors to the park would be counter to the whole idea of a national park. It belongs to the people of the nation. I would suggest the NPS remind themselves of that.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 18

Author Information

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Status:Reviewed Park Correspondence Log:
Date Sent: Oct 26, 2022 Date Received: Oct 26, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

With respect to requiring reservations, being able adjust on the fly and the opportunity to share stories and meet people during overflow situations is part of the experience of visiting Isle Royale. I vote to keep things the way they are.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 19

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Correspondence Information

Status:Reviewed Park Correspondence Log:
Date Sent: Oct 27, 2022 Date Received: Oct 27, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I have visited Isle Royale twice. This was several decades ago, but I plan on returning at least once more. From my memory, I loved everything about the island. The campsites were isolated, the trails were rugged yet nice, and there were few other folks around. I am not sure how much has changed, but I would like to see the health of the wilderness prioritized.

Thank you,
Sam Engel

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 20

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Status:Reviewed Park Correspondence Log:
Date Sent: Oct 27, 2022 Date Received: Oct 27, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Good morning. I am glad to see an EIS and forward planning being considered for Isle Royale. I have been there a number of times, backpacking and sea kayaking. It is a glorious, one of a kind locale.

I have read wolf studies, I have read fiction written by a former Park Service employee. I can't imagine that winter travel would be a good thing. As I understand this is commonly when scientists are there doing their work. A popular recreation locale needs a periodic rest. Winter would be the time.

Let the animals be and scientists do their work uninterrupted.

During the time I have traveled there, I have seen degradation of the visitor area and campsites. While snow provides a cover for trails and vegetation, certainly trampling of small trees and bushes would occur by snowshoers and skiers. I have seen this in other areas where people travel off-piste.

I do not support open, public winter travel. It puts people and pilots at risk and noises the air space. There are plenty of places in MN in the national and state forests to recreate in winter. We just need more ski trails there than motorized winter trails, but that is another topic.

So my vote is No on winter recreationist travel at Isle Royale. Somethng needs to be protected. All resources need not be open to recreationist travel. I cite boating allowed on only 2 waterways in Yellowstone Park near me. Boats do not belong on pristine waters used primarily by wildlife.

Thank you for your work. I hope others in the public will comment. Jerry Ladewig

PEPC Project ID: 109183, DocumentID: 120003
Correspondence: 21

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Status:Reviewed Park Correspondence Log:
Date Sent: Oct 27, 2022 Date Received: Oct 27, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Leave as is. Protect the wildlife not people.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 22

Author Information

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Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: Oct 27, 2022 Date Received: Oct 27, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

I am a dedicated ISRO hiker and paddler. I have been impacted by the challenges and isolation of the island. I have read over the plan and support Alternative B. I see the space available and know that it could provide further spacing between groups. It is already pretty challenging to access the island with its distance from population centers, cost, limited arrival methods, and weather. I know there are busier week and campsites and was recently there for 7 nights and only one was crowded and included 2.5 days of seeing no other visitors. Additional trail and campsite even rough remote and difficult to reach would give those with greater skill and desire to isolate the opportunity. Please don't require campsite reservations as in 8 trips I think I have only made the planned itinerary once and if we had been forced to the original plan would have been hiking or paddling with additional risk. I would also be willing to help carve the new trails and build sites. It would be the stuff of my dreams.

PEPC Project ID: 109183, DocumentID: 120003
Correspondence: 23

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Status:Reviewed Park Correspondence Log:
Date Sent: Oct 27, 2022 Date Received: Oct 27, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Open up the park for Moose hunting to right size the population.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 24

Author Information

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Status:Reviewed Park Correspondence Log:
Date Sent: Oct 29, 2022 Date Received: Oct 29, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Our family would like to visit in the winter if that opportunity became available. The existing shelters make the prospect approachable. We would enjoy snowshoeing the trails carrying packs with sleeping & cooking gear. Thanks for considering opening up the island to winter visitors.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 25

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Status:Reviewed Park Correspondence Log:
Date Sent: Oct 31, 2022 Date Received: Oct 31, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Please maintain historic properties such as those at Washington Harbor and Tobin harbor. They tell the unique history of Isle Royale. A responsible preservation plan should be implemented that benefits the Park Service and those that volunteer to maintain it.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 26

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Correspondence Information

Status:Reviewed Park Correspondence Log:
Date Sent: Nov 1, 2022 Date Received: Nov 1, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

While familiar with the Island in several ways, I have yet to have the wilderness experience of the Greenstone trail. However, I believe that it is in the Island's and the public's best interests to institute a reservation system for the backcountry campsites. With that recommendation, though, I would also suggest that there be a stipulation to have backpackers confirm that reservation 7-10 days in advance, thus allowing last-minute planners or folks who have the flexibility to travel out to the Island spontaneously to have access to the sites. Additionally, I believe that like other national parks, it is good stewardship to cap the number of consecutive nights that someone can occupy a standard campsite.

The unique nature of IsRo and the surrounding archipelago makes it appealing for a number of nature-seeking activities. But the effort and cost involved in making the trip would be clearly frustrating to me (as well as others who do not live nearby) if I were to show up for a "life list" backpacking trip and find that there were no available campsites, or that I would be sharing that experience with so many others to make it unlikely that there would be any solace or privacy.

Keeping IsRo wild is the intention; implementing reservations and consecutive night limits are reasonable approaches to achieving that goal.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 27

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Status:Reviewed Park Correspondence Log:
Date Sent: Nov 1, 2022 Date Received: Nov 1, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

As options are being considered for managing the Isle Royale National Park, I am against a reservation system for backpacking sites or kayaking/canoe sites. I have backpacked at Isle Royale twice and traveled to many of our National Parks. The reservations systems in place are poorly designed and often leave many sites un used. First come, first serve should remain the policy except for those areas in which access is available by motorized travel (boat or seaplane) and even then there should be only a few reservation only sites.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 28

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Status:Reviewed Park Correspondence Log:
Date Sent: Nov 1, 2022 Date Received: Nov 1, 2022
Number of Signatures: 1 Form Letter: No
Notes:

Correspondence Text

Seaplane surcharge:

Seaplane noise interrupts the feeling of isolation at Rock Harbor and Washington Creek, as well as campgrounds and trails along the entire north shore. There should be a minimum \$10+ surcharge (\$20+ roundtrip) per passenger per flight (with monies going directly to the park) to account for the intrusiveness and convenience of accessing the wilderness resource/park so quickly.

New campgrounds:

1. Tobin Harbor on the far west end of the harbor, on the north shore, on a point that is approximately a half mile off of the Mt. Franklin Trail. No boat dock recommended (no wake zone currently in effect west of the Duncan Bay portage trail). Paddlers and hikers only. 7 to 8 campsites. No group site.
2. Siskiwit Mine (immediately west of the mine). No boat dock recommended. Hikers only. 8 to 10 campsites. One group site.
3. Lake Richie (east shore, just south of the stream- nice sunsets). 4 to 6 campsites. No group site.

Temporary park surcharge (to be in effect the next 3 years, subject to extension):

Would not apply to private boaters.

To help with the cost of accomodating the increased numbers (new campgrounds, trails, etc.).
\$10 per visit

\$5 (children under 16)

Note: this surcharge would be in addition to the recommended seaplane surcharge.

Campground reservation system:

Not a good idea for two main reasons:

1. A forced itinerary will require folks to make bad decisions in terms of travelling in poor conditions, putting them in harm's way. This is particularly problematic when you consider the isolation of the park, and that emergency services can be many hours or even days away.
2. When ferries or seaplane schedules are interrupted/delayed by lake or weather conditions, a lot of friction/disputes will arise amongst visitors staying at Rock Harbor, Washington Creek, and 3Mile campgrounds.

Shelter removal:

Not a good idea because shelters save a lot of folks from hypothermia in the event of a Lake Superior storm.

In terms of restoring a true wilderness environment to the island, I would recommend discontinuing seaplane service prior to taking the step of removing shelters.

Thank you for considering my input.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 29

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Correspondence Information

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Notes:

Correspondence Text

Please consider Alternative C to improve one of the few wilderness areas left in the USA.

1. Isle Royale has limited access (no roads, bridges), and no commercial logging or mining pressure; making it a unique location to enhance a true unspoiled wilderness area.
2. There are plenty of hotel, lodge, and resort opportunities in the nearby areas in Minnesota and the Michigan UP. These high quality resorts are run by experienced private parties that offer more diverse, quality experience for people looking for managed natural areas.
3. Wilderness hiking and camping experiences will be enhanced by limiting the growth of non-wilderness activities on Isle Royale.

As background, I grew up in northern Minnesota, and learned to appreciate the unspoiled beauty of Isle Royale and the Boundary Waters before it was commercialized. Today, similar wilderness opportunities are greatly diminished within the United States, and many of my trips are now further north in Canada (to areas that resemble the 1950's Superior National Forest). The NPS should reflect on how "opening areas to visitors" has greatly diminished the wilderness resources they were intended to protect.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 30

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Correspondence Text

Hello,

My husband and I had the opportunity to visit Isle Royale 4 years ago. We arrived by ferry with our canoe and camped at the designated sites. It was an experience of a lifetime to be out in the wilderness there.

I vote that we keep the research station as it has provided us with the necessary information on how the moose and the wolves are faring. Without the information they gather the moose would no doubt be in great peril. It is a sensitive environment and needs people out there to witness the changes, especially now in climate change.

It is also important that the trails and the wooden steps and pathways be maintained so that hikers don't go off the pathways and ruin the pristine areas. It is a special place and needs to be protected as such. Some additional charges to go there could be brought in, but maybe look at some different ideas like schools teaching life skills and wilderness adventures bring volunteers who could get credit for their academic years.

I would love to be able to go back and see that the place is still being cared for as it was 4 years ago, if not better now that our Canadian wolves are making a living there.

Thank you for this opportunity to voice my option.

Allaine Nordin

PEPC Project ID: 109183, DocumentID: 120003
Correspondence: 31

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Correspondence Text

I prefer Option C

PEPC Project ID: 109183, DocumentID: 120003
Correspondence: 32

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Correspondence Text

I like the current conditions at Isle Royale. The "no-action alternative" looks ok to me

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Correspondence: 33

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Correspondence Text

We have only been to Isle Royale one time but we hope to return. We were fortunate to visit the cottage and meet the folks doing the wolf/moose research area and walk around a bit. Preserving the cottage would allow many others to do the same. That is an important part of Isle Royale history.

Another thing I would support is improving access within the park. The boardwalks are quite narrow and difficult for the elderly or unsteady folks to traverse. When we were there an older woman tripped and fell on the boardwalk and the Ranger Service had to carry her out. Making the trails wider could help to alleviate that from occur again.

All in all, we love the Island park and can't wait to return.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 34

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Correspondence Text

My first visit to Isle Royale was in 1977 as a 13 year old Boy Scout. I returned to Isle Royale with my wife 40 years later and was very pleasantly surprised at how much the island looked and felt the same as it did when I was 13. We appreciate the island's rugged and rustic beauty. I now volunteer annually for the Moosewatch research project and have a deeper understanding of the island's eco structure and believe that the NPS should work to maintain the rugged rustic beauty of the island for others to discover and enjoy.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 35

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Correspondence Text

Maintaining Isle Royale as a wilderness and keeping/maintaining the historical buildings are both essential.

I've spent time in other wilderness areas....a dozen plus multi day BWCA trips canoeing/portaging/camping, several trips to Alaska and a couple weeks on the South Island of New Zealand hiking (along with many US National Parks, State Parks and Scientific Natural Areas).

My thoughts

1) maintain Bangsrud cabin with the historical wolf-moose study folks living there. It has housed the longest running research study for decades and should be respected and celebrated for the accomplishments. It is my favorite place to visit on isle Royale and for many others interested in research.

2) create a limit on backcountry campers. When I was there in 2022 I heard from the rangers that camp sites were doubled up because there were more people groups than campsites. This type of excessive people creates erosion on the sites, trails and other aspects of wilderness.

3) don't expand campsite areas. The wilderness space needs to be maintained for the wild animals. Encroaching on their space would impact their behavior with human interaction.

4. Wilderness should be a unique and novel experience. Doing things like making room for more people, adding fancy restaurants and more amenities do a disservice to the natural world.

Our goals should be focused on safeguarding all remaining wilderness areas and preserving them for future generations.

Thank you for listening.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 36

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Status:Reviewed Park Correspondence Log:
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Correspondence Text

I'm not sure I like any of the three options in their entirety, as presented. There are components of each that I like, however. I like the idea of creating some new trails, especially in the middle of the island. But I don't like the idea of increasing the number of campsites except maybe at Lane Cove or Chippewa, which are on dead end trails with no nearby alternative options. I definitely do not like the idea of removing the shelters - the island is rough and rugged, weather is often averse. Those shelters don't make Isle Royale less wild or less of an experience. They add to it! I've enjoyed the refuge they offer numerous times, particularly in rain or freezing temps. I also don't advocate for restricting use in any areas that are currently open for visitors. And I LOVE the idea of allowing winter use!

I also think that more fire rings should be installed. Pretty much every other national park allows campfires. Even those out west that are highly prone to forest fires. I think Isle Royale staff need to relax a little bit about the "danger" of fires and let the public, who owns the park, enjoy fires at every campground.

And please stop giving the LEAVE NO TRACE talks to visitors! It's so condescending and totally not necessary. Again....no other national park I've been to does this, and quite frankly: it's ridiculous. Isle Royale has the highest return rate of visitors of all national parks. Why not honor your returning visitors by respecting the fact that they know how to conduct themselves in a responsible way in the wilderness.

Oh, and I'd rather have toilet paper than hand sanitizer in the outhouses. I was surprised to discover unstocked (with TP) outhouses in 2021, because it's apparently too expensive? - yet there were huge containers of hand sanitizer. That makes zero sense to me. Isn't hand sanitizer more expensive than TP??

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 37

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Correspondence Text

Thanks for considering public input!

I worry about the increase in visitors to Isle Royale in recent years. Without limits to the number of visitors, campgrounds become too crowded for anyone to enjoy, and visitors seeking shelter for the night have to camp outside designated areas, which further damages the wilderness around campgrounds and disturbs wildlife.

I've enjoyed years of permit-free camping, but I think perhaps the time has come for some way to limit the number of visitors to the island, whether by reducing the number of ferry and plane trips or by requiring permits to visit the island.

Sincerely,
Nadia

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 38

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Correspondence Text

Regarding the idea of needing campground reservations on Isle Royale, one problem I see is that there are many things that could prevent a hiker from arriving on their reserve campground on the date they reserved it... Adverse weather delaying hiking, trail conditions, trail closures due to fire, or even a hiker over estimating their ability to hike a certain distance in one day. All of these could prevent a hiker from arriving at their reserve campsite on a particular date hard considering the fact is

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 39

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Correspondence Text

I would be in strong support of Alternative B, or no action. Isle Royale has been well managed over my past 40 years of visiting the park in all manners. I have never felt that my wilderness experience was diminished, or solitude denied. In fact, I have found a special connection with meeting boaters and hikers alike and sharing my experience. This also includes the special families that have been long time summer residents of the Island. To me they are a high value cultural resource for the park. The wilderness experience is only a piece of the "MAGIC" of the island. Reducing places to safely stay or limiting it to reservations would distract greatly for my experience. Furthermore, not having the ability to move around the island without reservations limitations or restricted site access only further adds to decreased safety factors with the ever rapidly changing weather of Isle Royale.

Respectfully Submitted,

Ryan Blazevic
Esko MN

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 40

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Correspondence Text

To Whom It May Concern,

I write to provide feedback to the proposed alternatives addressing issues related to visitor use and wilderness preservation and expansion for Isle Royale National Park, known as Environmental Impact Statement (EIS) for a Wilderness Stewardship Plan (WSP). I appreciate the care and attention the National Park Service and staff have given to the archipelago and all that lives and resides there.

In summer of 2001, I worked for Forever Resorts as a waitress at the lodge at Rock Harbor. I was a mere 19 years old, but that experience left an indelible mark on me. Not only did we have a particularly cohesive staff that season where many of us made lasting friendships, but the island fostered in me a passion for the natural world. Early mornings before the breakfast shift would find me on the shores of Superior, greeting the rising sun. Often, on my way to the dining room I would encounter moose, fox, and a plethora of birdlife within arm's reach. In the evenings, a group of us would traipse over to Tobin Harbor and sing down the sun. On our vacation days, the Sandy would shuttle me to a remote drop-off point and I would hike back to The Rock. This would allow me to see even more of the island in my two-day respites. And the occasional canoe or small motorboat rental took me to small islands brimming with magical bogs, old fisheries, lighthouses, and spooky graveyards. My time at Isle Royale was formative and is a place where I hope to take my own children someday.

I also recognize that the island is home to a diverse array of wildlife and flora. From the varieties of lichen to the historic moose and wolf population, many precious species call Isle Royale home. I also understand that the volume of visitors to the island is greatly impacting the careful balance of life there.

That is why I write in support of alternative C, to enhance the wilderness by improving solitude. I believe that we must discard of notions of entitlement that drive much of our destructive impact on the

natural world and turn instead to a model based on reciprocity, of giving back. We have altered many landscapes and environments in the name of accessibility and profit. I strongly believe that rather than continue to commercialize the island's treasures, we must serve as stewards of restoration. I believe alternative C will help to restore this precious wilderness for the natural world that calls it home.

I look forward to learning the outcome of the Wilderness Stewardship Plan and thank you all for the important work you are doing.

Respectfully,
Raina Polivka

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 41

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Correspondence Text

Essential habitats disappear currently at an alarming rate to the detriment of every species on the planet.

Isle Royale is now and has been a unique habitat for productive scientific analysis and research for decades, where species interactions (wolves and moose particularly) can and have been observed.

I understand the desire for laymen to want to experience part of the culture by stomping their recreational way through the vital habitat, but I would suggest that other locations might be more suitable for that than the unique ecosystem that Isle Royale.

An increased recreational traffic on Isle Royale will only amplify the human decimation of an already fragile ecosystem.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 42

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Correspondence Text

My preference would be a blend of Options B & C. I lean toward C, but the line that says "eliminate trails" is a no go for me. I believe the existing trails and campgrounds on Isle Royale should be maintained. Maintained trails allow more people with varying experience in wilderness backpacking to experience the beauty and variety the park has to offer. Maintained trails also reduce the "social/casual" trails that can result when an area has high use.

Reduce the day use group size and bring into action a camping permit system for all campgrounds. If a particular back country campground has sites that are too close to allow a wilderness experience then some of the sites at that campground should be eliminated. Maintain the two front country campgrounds, with their three night stay limit, at Washington Harbor to allow for day use of the rest of the park trails by those who do not backpack. The use of a permit system for the back country campsites will eliminate crowding that diminishes the wilderness experience for park users seeking more solitude.

I have not visited the Northeast portion of the park, so cannot speak directly to that area. However, I would be in favor of the same management, as I wrote of above, for the Rock Harbor area regarding "front country" campgrounds, accommodations and the trails to back country sites.

Isle Royale visitors must make arrangements to access the park via ferry, private boat or float plane. Including obtaining camping permits in their preparations is not a hardship for someone going through that planning process for their arrival. Camping permits will help protect the wilderness aspect of the park while allowing access for people who want to try a wilderness experience.

**PEPC Project ID: 109183, DocumentID: 120003
Correspondence: 43**

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Correspondence Text

save the building and don't make the wilderness access cost anything

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 44

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Correspondence Text

Thank you for the opportunity to comment on the Isle Royale Wilderness Stewardship Plan. Having visited the island as a backpacker 3 times in the last 5 years, I appreciate the wilderness, solitude, wildlife, and remoteness.

Alternative B states it will focus on enhancing wilderness character. However additional access opportunities including new trails, new campsites, and additional sites in existing campsites seems like it will reduce the wilderness on the island by opening it to more access, larger campsites, and more trails. I'm not real excited about that concept.

Alternative C states the same idea, enhancing wilderness character. This alternative plans to shrink the existing campsites, trails, and includes other restrictions that will only jamb it up, crowding people into less space.

Instead, Alternative A proposes no-action alternative. I like this concept. The island is remote and wild, and provides solitude as it is. Sure I have bumped into other backpackers on trail, and that's fine. Campsites can get crowded, but everyone figures it out. The historic structures are just that, historic. They are interesting to check out as they are. The island has a past, and those structures are part of it.

I appreciate that there is concern for Isle Royale and maintaining it as a wilderness National Park. I'm glad to see good, viable options but really like Alternative A, the no-action alternative.

Regards,
Matthew J English
Backpacker and wilderness lover

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 45

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Correspondence Text

Hello, I support the plan A action of no change to existing management, I could support expanding public use as alternative B but I do not support restricting access further as in alternative C. Isle royale has had a long history of human use and I support maintaining or expanding that use. Please don't change the use of isle royale.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 46

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Correspondence Text

Thank you for giving consideration to optimizing the way the park can be managed to fulfill the mission of preserving resources for the enjoyment, education and inspiration of future generations. I have observed over my lifetime that various administrations of Isle Royale National Park seem to focus on the "preserve" while neglecting the "enjoyment" piece. As a result, restrictive policies of various types have at times been implemented. This is unfortunate, and certainly a contributor to the timeless statistic that Isle Royale is perennially the least visited park of our country.

This is a shame.

Yes, the unspoiled serenity is what makes the park special. But, there is plenty of serenity to share in a park this size. I am greatly concerned about the horrible consequences of Option C. Further reductions in park access will reduce enjoyment, both in number and in quality. Additionally, they will make the park an even more elitist destination than it is today, by reducing access for those who benefit from amenities afforded by the VERY MODEST commercial operations on the park. Do not implement Option C.

In terms of choosing a preference of Options A or B: I have read the document carefully and cannot discern the meaning of Option B. It is sketchy at best. Some elements are attractive, such as adding a campsite and trails, and preservation of historic structures. However, there is a veiled reference to destroying others WHICH I DO NOT SUPPORT. I am very concerned that the historic structures in question may include fishing camps, are part of the rich history of the park which need to be preserved for education, for inspiration of visitors. As such, I ask that you be more transparent and forthcoming to your constituency by providing more details on the proposals.

As a matter of background: I have been visiting the park for 55 of my 57 years. I have done so by

nearly all means possible, including excursion boat, sailboat, powerboat, canoe and hiking. My early childhood was shaped by experiences of the park. On the human side, there was staying with Sam Rude, an aging fisherman who who occupied Fisherman's Home near Siskiwit Bay and fished there for more than half of a century. He taught me to clean fish, to preserve it by smoking or with ice harvested from the bay in the spring, and I watched him load traditional wooden fish boxes onto the Wenonah for delivery to consumers in Duluth. At the other extreme is the natural side: I have, for example, watched a calf moose being born during an early May trip. I was just a boy on a chance trip to Ryan Island with an older cousin. Both are magnificent memories, both are precious. And, to the extent possible, both of these classes of experience are vital to preserve in the interest of a complete preservation of Isle Royale.

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

- 1) I don't really have any other alternatives or other management tools to consider
- 2) for me the most important issue to consider when evaluating future stewardship is maintaining and growing visitor numbers. In my experience Isle Royale, due to its location and size, will always ensure some level of solitude, no matter how popular it becomes. I think going more rustic with fewer trails and would turn people away, which for me, is not the best thing for the park. But I also don't want paved trails, electricity and running water either. After finishing the greenstone or Minong, I really like the rustic feel of Windigo, Even the people staying in the house keeper cabins are roughing it. And it's fun to hang out on the deck of the store having a couple of beers and a pizza and sharing tales of the trails with fellow visitors
- 3) I like alternative B the most. I really like the idea of additional trails, a new campground and additional campsites at current camp grounds. I think the first 2 would also improve solitude since the visitors would be spread out more. I would imagine it would have a negative impact on wildlife and environment. Although Isle Royale is by far one of the cleanest places I have backpacked or hiked, I like the idea of additional campsites at existing campgrounds because not having a site at the end of a long days hiking is always one of my fears. and even though I know I can set up in overflow sites or 1/4 mile off trail but we try to avoid that. Although we rarely stay in the shelters, when available, I would not like to see them go away. They are a great alternative after a long rainy day (but maybe you could ad foam bumpers to the door frame to reduce the door slamming noises :)) The most intriguing thing in Alternative C was allowing winter public use. Snowshoeing IRNP would be incredible.

Thank you for taking the time to read the book I posted above lol
And thank you for all that you do to make our National Parks a national treasure. I truly do appreciate all that you guys do.

Tim Datsko
Lapeer, Mi

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 48

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Date Sent: Nov 3, 2022 Date Received: Nov 3, 2022
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Correspondence Text

Isles royale is a special park it's heritage is water fishing based. I believe that that this heritage should be preserved in any park management plan including the historic fish camps that are located around the park. These camps are special places and should be preserved for future generations as part of our nations history. It's fine to add the hiking and camping component to the park as long as the interior is protected from environmental damage. It is important to remember that this parks landmass has historically been accessed by water which is the least invasive form of recreation in the park. This water component should be included and protected in any plan.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 49

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Correspondence Text

I'd love to see the structures on the island restored and preserved, especially those around the Edson Fishery and Bangsund Cabin. Human history on the island is significant and telling that story is important.

Regarding access to wilderness areas: I'd like to see the same access, or possibly more access. I hiked some of the 'defunct' loop near Feldttman Lake and would love to see that restored with boardwalks over swampy areas.

Thanks.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 50

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Correspondence Text

I am a 1967 graduate of Michigan Tech. I spent time on Isle Royale in September of 2017 - 50 years later. I currently live in the Adirondack mountains of New York and experience first hand on a daily basis the detrimental effects of the new invasive species - humans. The mountains and lakes and streams of the Adirondacks are being destroyed by "over-visitation" . The mountain trails are muddy, trampled messes and human excrement is often encountered. The once peaceful lakes are over run by jet skis. The very reasons people want to visit are being destroyed by too much tourism. And our over-worked forest rangers are run ragged, risking their lives to rescue inexperienced users.

With this background, I am firmly in favor of Alternative C by focusing on improving solitude and preserving the wilderness habitat. However, the research being done is invaluable, so historic structures, such as the research stations should be preserved and allowed to continue. I have watched with great interest the reintroduction of wolves to the island to help restore the balance and stop the moose destroying themselves and the flora. I look forward to the continuing saga. Winter access should be very carefully considered and limited to those that can prove their capabilities to handle such an extreme environment.

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

Dear NPS,

I would like to offer you some specific comments but it seems the options you have presented are so vague that it's a bit difficult to give you specific feedback Here's an attempt though.

First off, our National Parks are for the PEOPLE - current and future generations - to enjoy.

All options should center around who the PEOPLE are - what are their needs and desires for enjoying the park, How will they get to the park? How will they enjoy being there? What is a reasonable number of people that the park can support at any given time?

Who is the park intended to serve? Is the park intended for the rich who can afford a big enough boat to handle Lake Superior and limited fuel sources? Is it for the young and intrepid? Is it for the rangers and NPS personnel as their private preserve?

Or, is it for the average American of all ages to enjoy with reasonable amenities such as affordable transportation to the island, well-maintained docks, fuel, safe trails, campsites, shelters, potable water sources, and biffies, affordable services (lodging/food/supplies). Safety should also be a prime concern.

It seems that Isle Royale is hard enough to get to without the need to restrict access and enjoyment even further. Especially by TAKING AWAY the rich cultural sites, trails and camping/shelter amenities that currently exist.

In fact, I would argue we need MORE amenities to serve the PEOPLE. So, Option C should definitely be eliminated. There is plenty of solitude to be found currently when 99% of the island is designated

wilderness. Just step out 100 yards from any of the campsites/docks and one can have deafening solitude.

I have visited Isle Royale about 15-20 times over the last 54 years and would like to visit more often but it's a challenge logistically and it's expensive. Every time I was there was a privilege. There was not one instance where I saw evidence of human destruction or overuse. This would be hard to imagine in a park this vast, difficult to get to, and with such low visitorship.

I've watched how access to the Apostle Islands National Lakeshore was restricted bit by bit over the years - almost to the point that if the previous superintendent had his way, no one would be able to safely and reasonably access the park but the people with huge private boats who could safely anchor a long way offshore and weather a big storm, marathon kayakers who could attempt long crossings and bushwhackers willing to risk getting lost on grown over trails and campsites situated in hot and buggy mosquito swamps. I hope that this current effort at IRNP is not aligned with the past efforts at AINL - or with past history of IR-NPS antics of burning docks, etc.

The thing is, if we want more people to become stewards of this planet and the wilderness (which we should all want), we need to get more people into the wilderness for extended periods of time and educate them along the way. We can't have them simply watch a video in a visitor center and expect them to truly appreciate nature. We need to build MORE nature lovers by getting them INTO nature. That's what our parks are for! They are not preserves for the wealthy elites or shangi-las for our National Park Service personnel. As Ken Burns said, our national parks are America's Best Idea.

PARKS ARE FOR THE PEOPLE. Let's not lose sight of this. Please do not do things that restrict access. Please **EXPAND** access and manage appropriately. I can't imagine IRNP is going to suffer from overuse anytime soon.

Thank you for considering these comments.
CIndy McDonnell

PEPC Project ID: 109183, DocumentID: 120003

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Bangsund Research Station must be preserved. It is an important part of the history of Isle Royale. It was an very important part of my experience there.

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

I've only visited ISRO once, summer 2022, so don't pretend to have a full or complete understanding of its character, or the most informed position on what is best. However, I can share what my own family appreciated deeply about the place, and would value preserving.

First & foremost for me/us would be the magnificent solitude of the place. We backpacked for several days and found the campgrounds to be delightful--specifically, the sense that one wasn't right atop the next campsite (often not even in view of the next campsite) was a delight. As they do fill, I'd not suggest reducing the number of sites per campground, but would also suggest that adding more sites to existing grounds would be fundamentally to the detriment of the experience. Similarly, would oppose any increase in group size limits or increased commercialization of the park via increasing tour operators, etc..

Second, as regards the various historical structures on the island(s): we as a family found these sites to be a part of our trip to ISRO that enhanced rather than detracted from the experience. Specifically the Bangsund Research Station and the nearby Edisen Fishery very much sparked interest from both of my kids in the wildlife of the island and the history of the people who have lived there over the years. The footprint of these & similar structures--relative to the surrounding wilderness--is quite small, but their impact on (particularly for kids) the understanding of the place is large.

Thanks for your time & consideration.

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

Let me start by saying that I have enjoyed Isle Royale National Park for almost 30 years. It has become a beloved annual event for my husband and three kids since 2014 when my youngest son was 4 years old. It is truly near and dear to our hearts. I support Alternative B but see value in Alt A.

More trails, and even some campsites off the main trails on the Rock Harbor side would disperse user conflicts/interactions significantly. Given the terrain and timber type, it is very hard to disperse camp on the northeast side of the island. If small clearings were made, and coordinates given, then people could hike in and be assured of a cleared spot. This would offer more wilderness opportunity, and keep these areas without noticeable trails. A few more connector trails would offer more options and disperse traffic even further. We ran into issues with hiking with small kids on distance between campsites and limited choices. I have to say that hiking from Daisy Farm to Lane Cove in 1 day with a 10, 8 and a four year old was a challenge! The Minong Ridge could use another camp site between North Lake Desor and Washington Harbor and a connector trail to the Greenstone from the Minong west of North Lake Desor.

I do not support the removal of shelters, instead would like to see maintenance and improvement. Also people come to IR for different reasons. We really love exploring the ruins, history and seeing the old artifacts associated with the historical use of the Island in their natural state- not behind glass with kiosks. We would not like to see those places demolished. My kids love looking through the old fish shacks, the school house, mines ruins etc. These do not have to be restored, but the value is in seeing the remnants and way of life, the difficulties with trying to eek out a living in one of the toughest places. Trying to make this 50 mile long island a 'True Wilderness' experience is ridiculous. The history, sport- fishing, boating, and diving culture of the Island is immeasurable. There are other areas that are more conducive to a 'Wilderness' experience out west, BWCA etc. Isle Royale is unique because of all the things available here. If you want a more wilderness experience you can find it on the

Island- you just have to work at it a little harder but it is there. On the other hand- some people are just looking to experience the Island as easy as possible, kind mix camping with the hiking experience.

I do not support any more designation as Wilderness, especially anything that negatively affect other users, lessees, or private property on the Island.

I do not support Alt. C at all.

Also the Park Service should provide the same level of service and maintenance as before COVID. For example TP in the outhouses and cleaning at the shoreline campgrounds. We came in 2020 -COVID and prepared for lower maintenance and services and enjoyed the reduction in visitors for sure- but if you severely limit the number of users and reduces campsites/campgrounds like Alt C then become a place where the average person cannot enjoy. We have tried to get our desired itinerary successively at Glacier but we know we can always come to IR. People can pick and choose their interaction with others by selecting early dates in May or later in September.

We were disappointed in the level of service and maintenance in 2021 and 2022 especially at Windigo and Daisy Farm.

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I recommend keeping the Wilderness aspect of the park in priority when considering any changes. Generally, designating the area outside of established high use areas like Windigo and Rock Harbour untrammled is important to honor the Wilderness Act. Considering which structures are "historic" and add value to the perspectives of future generations and placing against the need to preserve wilderness conditions like solitude, quiet and visual impacts will be paramount.

As a Park user who visits via sailboat, I value the wilderness aspect of the anchorages highly and appreciate that others can hike to campgrounds and experience wilderness in that manner. Preserving those experiences in an ever increasingly manipulated and constructed world should be a priority of the park's planning. Creating those options for solitude and physical adventure is key. Clustering areas of high use and managing it so it does not impact the wilderness areas is also important. Thanks for listening.

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I was a visitor to Isle Royale a few years ago and was lucky enough to make my way to the Bangsund Research Station where I learned so much about the ecology of Isle Royale and the importance of wilderness areas generally. The setting made this particularly inspirational. The outreach such as that which took place at the Bangsund Research Station is critical for public support for the National Park Service and wilderness areas. Please preserve the Bangsund Research Station.

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My opinion is that Isle Royale should follow a combination of option B and option C. More new campgrounds should be built but a permit system should be enacted to control the number of people on the island at a time. The huge volumes of people now interested in visiting this island is starting to hurt its character. There is often not a place to camp between June and September and the campgrounds are getting to be dirt patches because of the high traffic. The wilderness areas that have structures such as the houses near Scoville point and Bangsund cabin should be preserved or left because they improve the quality and character of the park without inhibiting its wild-ness.

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I am a sea kayaker and have visited the island many times including 3 times circumnavigating the park. My last trip in 2021 had us paddle to the park from the Pigeon River and return there after circumnavigating the park. Neither crossing occurred on the day that it was planned to happen. I have backpacked at Isle Royale, but that was over 20 years ago. Like many others, I have visited the park many times and it is my favorite park for a variety of reasons. My goals and needs may, however, be kind of unique.

With regard to any permit process, what is there now (pre-trip itinerary and actual itinerary) works well for me. Actually, I am not sure what else would work. I am at the whim of the weather much more so than hikers and have not had a trip go as planned due to the influence of the weather, particularly wind and waves. On our trip in 2012 we had to stop at Rock Harbor campground due to the waves and wind tiring out one of our group. There was no place to stay, but then someone offered us their "extra" shelter (for which they didn't actually have a second permit). Pictured Rocks, publicly, requires adherence to my itinerary and reservations. That has required me to reserve more campsites than I used in order to make sure that I would be legal depending on what the weather presented. That makes those sites unreservable for others on the days that I don't actually use them. I'm sure that I can camp where I need to in the case of unsafe conditions on Lake Superior, but when asking the rangers about kayaking their shore, they have not directly indicated that option.

With regard to the historical areas and structures, I have visited many of the old fish camps and that is a part of the island that I like to see. It would be great if they were stabilized if they are no longer used (Crystal Cove, Captain Kidd Island, Wright Island). Even in the relatively few years that I have been visiting, I have seen changes/degradation of the structures. I don't mind that some are currently used either (Bangsund cabin, Johnson Island, Fisherman's Home(?) - we visited Mark Rude when we circumnavigated the Park in 2008). I definitely don't want to see them destroyed in the name of

preserving the wilderness. If you do that are you also going to eliminate the poor rock piles near McCargo Cove? Fill in the old mines? In some sense maybe there are too many structures in the Tobin Harbor area, but even those I don't mind so much. We were paddling in the area in 2021 and stopped by one of the families and shown their camp and the historic small boats that they have collected from other families who had lost access to their camps and left the small boats on the island. That was an interesting side of the history of Isle Royale that might have disappeared if this family had not collected the boats. One of the boats I had seen being rowed in Tobin Harbor on a trip in 2005.

The past few years it seems that Isle Royale has become more popular. Reducing the number of visitors that it can support by reducing trails and campgrounds seems counterproductive.

As a sea kayaker, maybe I see the island as more wilderness than the hikers see it. I don't run into nearly as many other users, except at the campgrounds. And even then, for the most part, I use campgrounds on the outer islands or those not serviced by trails, or those on one way trails, when I can.

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Correspondence Text

We visited the Bangsund Cabin cabin this past summer. Their research, in my opinion, is very valuable. With just reintroducing wolves these past few years, their research is even more valuable now. With minimal impact on the island and such a historical site, it would be such a shame for this research to not continue.

Best, Dawn Estes

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Correspondence Text

The Bangsund Cabin should be preserved

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Correspondence Text

Thank you for the opportunity to comment on the proposed enhancements to ISRO park planning. I am a long-time visitor, having gone as a participant on guided (AKA commercial) programs in my youth, then on my own, as a guide myself, and additionally as a researcher in support of the Isle Royale Wolf-Moose program. I've spent nearly 3 months cumulatively on the island across many years.

I write in staunch support of Alternative B in the plan, followed by Alternative A. I write in fierce opposition to Alternative C.

Alternative B represents many positive changes and reflects the changing national dynamics of public lands. Across the country, we are seeing a greater need for access to public lands alongside diverse populations. In addition, in parks across the region, we are seeing an increased acknowledgment of the human history of interactions with parks. Alternative B maximizes the potential for most of those trends. Unlike other Wilderness areas, which are at risk of increased mechanization and uncontrolled access, Isle Royale has some inherent protection against these risks by virtue of limited access to the island. As such, we can have greater faith in the Park Service's capabilities when thoughtfully expanding access. While I would support, as a rule, investment in existing structures as opposed to mouldering and demolition what is more important is that there is a plan - benign neglect is just mouldering without calling it such.

Alternative C strikes me as the most foolish course of action. It restricts the islands to only a limited few with the means and capabilities to explore the park of their own accord. It restricts one of the primary avenues for underrepresented and historically marginalized populations to explore the park, via group guiding that ultimately falls under commercial use (including camps, summer camps, and youth programs). It limits the elderly or those with mobility challenges under restrictions for day use access. These facets of impact run directly counter to Director's Order 16b (issued 3/29/12), which includes

language obligating the park service to “creating and maintaining an inclusive approach to all policies and practices.”

To be clear, I am chief among the population that would benefit from Alternative C - but it is still the wrong course. I am an individual user with the resources and capabilities to manage my own travel to the park, and the experience and skills to enjoy in in solitary fashion. But if the park would like to prioritize users like me, it would be better served opening up the expansive off-trail segments or shifting permitting structure to do so solely on the west end. It should not do so at the expense of a larger, more diverse user group that better reflects the composition of our country. The Wilderness Act calls for a place that has solitude OR primitive and unconfined recreation. Alternative C is not needed to better suit the asks of the Wilderness Act, especially as it already has a better claim than most parks to other aspects of Wilderness Act definition.

The spirit of the Wilderness Act is that these places endure as a place where a person can be “a visitor who does not remain.” That means we still need to let people be visitors. Isle Royale can manage this thoughtfully without resulting to reactive, inequitable approaches - and can maintain one of the crown jewels of our park system with an eye to all its citizenry.

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Correspondence Text

Hello,
I've visited IRNP on 2 separate weeklong trips, and am a huge fan of the park.

When I describe the park's highlights to others (and I do it a lot), I always include the Bangsund Cabin Research Station. Talks given by the researchers and their collection of Moose bones are a highlight of ALL our trips to the island.

I believe this property and its function are a benefit to the island and ****Must Be Preserved**** for as long as possible. Shutting down or removing this station would destroy a large portion of our IRNP experiences.

Beyond the science they do. the researchers' nightly talks at 3-mile and Daisy farm are incredibly informative to campers. Those talks most certainly result in backpackers who know more about the ecosystem and are better able to understand AND PRESERVE IT.

Please...Please preserve this station and continue to support the researchers as much as you can.

Many thanks,
Jerry Karn / Holt Michigan (Near Lansing)

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

I'm a 75-year-old backpacker who has been coming to Isle Royale for 40 years. My last visit was August, 2022. We've visited about half of our national parks. IRNP is still my favorite and the only park that we've visited more than twice.

To comment on your plan, I've commented first on issues (Q # 2) then combined alternatives with likes & dislikes (Q # 1&3)

Q2: What issues should be considered when evaluating future stewardship of wilderness at Isle Royale?

WHAT IS WILDERNESS? It seems worthwhile to first define what wilderness is before undertaking a plan to create and maintain one. The oft-quoted definition is the "untrammled" one in the wilderness act. I recently read Yi-Fu Tuan's Topophilia. I prefer his observation that wilderness is "as much a state of mind as a description of nature." In other words, it must be an environment that visitors feel is natural and serene. But another definition is one I call the "Truman Wilderness" after the movie "The Truman Story". The central character of the movie was born on the set of a reality show and grew up thinking that he lived in a real city. Likewise, a Truman Wilderness is one artificially created to look like a natural one. And lastly, wilderness is increasingly defined as a marketing tool. For example, Subaru recently announced a "wilderness" model with higher ground clearance and knobby tires to improve sales. Likewise, promises of a wilderness experience at IRNP can be promoted to increase visitation.

DEMOGRAPHICS - The plan should define who it is intended to serve: Wealthy people, needy people, families with kids, seniors, disabled, indigenous peoples, cottage owners, contractors, researchers, artists, students, etc?

RULES - To maintain a wilderness environment, it's necessary to define and communicate visitors' expected behaviors.

ENFORCEMENT - Rules mean nothing if not enforced. Deliberate disregard or gross negligence should have consequences beyond a small fine; eg significant fines or loss of visitor privileges.

Q1: What other alternatives, alternative elements, or management tools should be considered?

Q3: What do you like and dislike about the preliminary alternative concepts, and why?

FRONT COUNTRY - I see the front country as a necessary feature that doesn't detract significantly from a wilderness experience. I tell people that wilderness begins a short walk from Rock Harbor, Daisy Farm, etc. Nevertheless, during peak season, it would be helpful to provide better transportation out of the front country. During the peak, congestion extends to Moskey & McCargoe. The water taxi is expensive. The Voyager schedule currently doesn't align with the Ranger schedule.

MORE CAMPGROUNDS - That would be helpful. There's no wilderness experience when campgrounds get too crowded.

MORE CAMPSITES - Yes! More campsites within existing campgrounds would be a simple and effective way to address increased visitation while still providing a wilderness experience. The added campsites need to be individual sites that are distanced from neighboring sites. The "overflow" sites recently added to RH & 3Mi are an abomination! Trying to sleep 10 ft from someone in the next tent who snores all night is NOT a wilderness experience.

SHARING - Having to share a campsite, or worse a shelter, is one of the greatest barriers to the feeling of quiet & solitude required for a wilderness experience. Most visitors understand the desire for quiet and behave responsibly. Many times, we've offered to share with no problems and even met nice people in the process. But sharing a shelter is akin to sharing your bedroom. Obviously, it can interfere with feelings of quiet solitude.

TRAILS - In my opinion, trails, like front country, are a necessary part of accessing and enjoying a wilderness experience. Few people who have tried navigating numerous blowdowns early in the season, would suggest trail elimination as a viable alternative. And it would exclude many senior visitors. In parks where they've tried this approach to wilding (eg Nordhouse Dunes) I have found that social trails & random campsites are more "trammed" than those with designated trails and campsites. It's more difficult to implement LNT principles where visitors are dispersed.

SHELTERS - Trail shelters are a wonderful addition that provide comfort, quiet and solitude. Plus, they are a valuable resource in an emergency. With increasing visitation, more would be better than fewer.

RESERVATIONS - We've been to parks that have a lottery for campsites eg Bright Angel CG in Grand Canyon; Wonder Lake CG in Denali). I prefer the "first come" approach in place now at IRNP. The lottery can make it difficult to arrange a trip and can require that all other travel plans work around it. It also increases costs to run the reservation process. If you do implement a reservation system, include a process for cancelling. We've found many EMPTY sites at hard-to-get campgrounds because people don't cancel. Also, the current system at IRNP allows flexibility to deal with weather, fatigue, injury, etc. This flexibility is particularly important to canoeists and kayakers.

WINTER USE- I support efforts to reduce or disperse traffic during peak times. But I don't know how winter visitation would work. Besides, the wildlife seems to appreciate a break from visitors!

TENT SIZE - I've noticed some visitors using larger, car camping tents that take up more space at campsites. It may help to limit tent size or at least discourage large tents.

RESEARCH, VOLUNTEERS - I've encountered research groups and volunteers who set up camp at a shelter for an extended stay. That should be limited, at least during peak season.

GROUP SIZE - In my experience, I've found that groups of four or less are least likely to disturb the serenity and solitude required for a wilderness experience. Each additional person seems to exponentially increase the risk of a disturbance even from normal conversation or occasional "loud talkers". The group sites that are separate from the individual sites are not often a problem.

PROMOTIONS - If there are too many visitors, maybe we should stop promotions - at least those aided

by the NPS. (If you're in a hole, stop digging!) It seems like Find Your Park; all the PR around the wolf / moose study & translocation; social media; and programs like the recent episode of "UTR Michigan" combine to bring more new visitors. Promotions often fail to discuss the planning required. And they paint an unrealistic picture; neglecting to mention the rain, sleet, cold, mud, rocks, blisters, bugs, transportation delays, high winds, sea sickness, risks of injury, etc that are part of a wilderness experience.

PERMIT PROCESS - The presentation at the permit process should focus on the wilderness nature of the park and what behaviors are appropriate. Much of a wilderness experience depends upon the need for visitors to respect the resource and fellow visitors.

CULTURAL PROPERTIES - I have had limited exposure to the cultural resources. I've only visited the Bangsund, Dassler, Edison cabins and the Chippewa Harbor tourist cabin. I have no issue with those that I've seen.

WINDIGO CABINS - The cabins at Windigo seem to be a popular option. They seem like a comfortable and affordable option for families. Maybe there should be more.

COST - It's become considerably more expensive to visit IRNP. I believe that many families are already priced out of a trip to IRNP.

BOATS - Some of the shoreline campgrounds are noisy with power boat and seaplane traffic. Although it can detract from peace & quiet, I don't see any reasonable approach to eliminating it.

INTERPRETIVE NATURALISTS - A focus on nature and wilderness by interpretive naturalists would go a long way toward enhancing the reputation of IRNP as a wilderness park. I fondly remember presentations by author and park ranger Robert Janke who excelled at presentations about the natural environment on IRNP.

ELECTRONICS - I've noticed that satellite communicators (Eg Garmin inReach) are becoming ubiquitous - enabling visitors to text home regularly. I believe they detract from the sense of solitude and isolation that's indicative of a quality wilderness experience. Recently, an interpretive ranger said that the first question she gets is "What's the Wi-Fi password?" If cell towers are next, I think that would be a step away from a wilderness ambience.

FIRE - I support an approach where natural fires are allowed to burn unless they threaten front country. Having said that, I was disappointed to see that the trees at the Dassler cabin had to be removed to save that structure. Perhaps we could take some risk in that case.

SUMMARY - I greatly appreciate your efforts to protect IRNP as a wilderness. Thanks for asking for comments. I've long believed that the IRNP staff is among the best in the NPS. I'm confident that you'll be able to respond appropriately to the current issues. I'd like to continue saying - Isle Royale is my favorite park!

Note: To the extent possible, I prefer that you not distribute my personal information outside the NPS.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 64

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Correspondence Text

I just wanted to drop you a message to let you know how much we enjoyed our visit to Bangsund Cabin while visiting Isle Royale last summer. This living museum was one of the highlights of our visit and we do hope you will consider preserving it. Thanks!

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 65

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Correspondence Text

Isle Royal National Park Planning

In response to the Isle Royale National Park planning options I would like to offer my concerns and options to be considered.

I am the third generation to enjoy Isle Royale. My grandfather, Peter Lovold settled 1 mile East of the Split Rock Light house in 1903 from Norway. He was a commercial fisherman; my father grew up fishing with him as well as my brother and I.

Peter Lovold and his brother-in-law Olaf Ronning fished together on the North Shore and also out of Green Island on the North Shore of Isle Royale.

I made my first trip to Isle Royale in 1960 in a 16-foot runabout. I have been going there generally 1 to 2 times a year for 62 years. The love for the Island has been passed on to my daughter and son who had many trips with us to enjoy the wilderness, wildlife, camping and fishing.

Over the years I was very fortunate to meet and enjoy many of the original family settlers to the Island. To see some of the changes made to the original homesteads is very disappointing. Learning the personal histories of those original families adds to the uniqueness of the island we all treasure. The park is one of a kind Island adventure to visit and enjoy. To restrict boat access or use of the existing facilities would be a mistake. The Island should be maintained as it is today for all those who love wilderness and appreciate the opportunity to visit by their necessary means. We should not discriminate against those who are handicapped or have issues inhibiting them.

Additional changes to campsites, trails, docks, and boating restrictions should not be done.

The option "C" would block opportunity for most people to experience, love and learn to protect the wilderness. Our national parks are for all people.

Thank you for allowing me to express my feelings.

Renny Lovold

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Correspondence Text

I prefer the no change option. I feel that the park is managed in an optimal fashion. No more wilderness is needed or restriction of access is required.

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

I am 75 years old and I have been visiting Isle Royale regularly since about 1978 to hike and camp with my family. After I retired in 2008 I began volunteering for Moosewatch which collects moose bones on the island for research purposes. I was at Bangsund Research Station this past September cleaning moose bones for storage that other volunteers had collected. I favor the "No Action" alternative for the Bangsund Research Station.

One of my reasons for preserving Bangsund is that it helps visitors to the island better understand the interrelated life cycle of the largest animals on the island: the moose and the wolf. Without visiting the Station one could easily miss the important role that moose play in the vegetation of the archipelago. I have gone to Passage Island on the Sandy and seen how different the vegetation is there, but until then I did not know how the moose consumption of balsam fir changes the landscape. I don't think the majority of visitors take the time to do this. Also, though I have been on the main island many times, I have never seen a wolf there. A casual visitor could miss the significance of wolves. The impressive collection of moose skulls at Bangsund and the informative explanations of the researchers there acquaints a large number of visitors to the island with the significance of that predator-prey balance. Also important is the pairing of Bangsund with the Edisen Fishery. The fishery shows the struggle of humans to survive on the island, and Bangsund shows the struggle of wildlife to survive there. The two are within easy walking distance of one another, and visitors who take the Sandy from Rock Harbor to Edisen often take the short walk to Bangsund.

Finally, the experience provided by MTU to the Moosewatch volunteers is eye-opening. I found bushwacking with Moosewatch leaders to be a significant wilderness experience that gave me a different view of view of the island from that I had after camping in the permitted sites. While I have given up that experience due to my age, I will always carry that with me, and I encourage others to try it. When the Moosewatch teams start or end from Daisy Farm, the Bangsund Research Station is an R&R site for volunteers after their arduous experience, and I hope it will continue in that role for many years in the future.

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

We thoroughly enjoyed a visit at Bangsund Cabin on Isle Royale this summer. It is a true Michigan and US treasure and should be considered highly for preservation and at the very least, stabilization. It should not be considered for mouldering or demolition. Every other member of our tour group commented that our visit there was the high point of their time on Isle Royale. The moose and wolf populations of Isle Royale make the island so unique and preserving the history of those populations through the studies done by the Petersons is crucial to continuing this important work.

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

Hello,

I read with great interest in the proposed changes to Isle Royale. I am a sailor and have sailed most of the great lakes and the entirety of the Caribbean. I always come home to Lake Superior as it is my favorite place to be. Isle Royale is the gem of the lake and I would hate to see it change in a way that makes it more difficult for anyone to enjoy it's beauty.

I would like to see the island stay in its current format (proposed plan A). Much of the appeal of Isle Royale is that it is not easy to get to. This limits the number of visitors whether boating, hiking or kayaking. The current restrictions on boat access and generator use seem more than adequate. I don't know of a single boater that has an issue with these rules. By adding more camping areas it will make the island feel less remote. Taking areas away to create more wilderness seems a bit excessive. There is plenty of solitude to be had in the park for everyone without a major overhaul of the "rules". I don't want to be told I can't anchor in a particular bay because someone doesn't like boats. I certainly don't want to gaze across a shoreline and see a half a dozen orange tents impeding my view.

As of now, I think we have a good balance and everyone seems to get along just fine. No need to mess up a good thing.

Thank you

Tim Hanrahan

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

As someone that has solo hiked Isle Royale several times, i have greatly appreciated the solace and peacefulness of the true wilderness experience that the Island offers. I would support Alternative C and the further embellishment of the full wilderness character of Isle Royale.

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

I am a recently retired middle school science teacher, currently managing professional learning for the Mi-STAR science curriculum program at MTU. I worked with Phyllis Green last winter to author a series of lesson plans regarding the return of the wolves for the National Parks of Lake Superior Foundation. I care deeply about the park and about the wolf-moose study.

Isle Royale has always held a fascination for me, as the site of the world-famous moose-wolf predator/prey study, and as part of the stunning beauty of the western UP. I first visited in 2016, and since then I've returned three times, including a week in the Moosewatch for Educators program. I have two visits planned for summer of 2023 - returning with my daughter and son-in-law who became "hooked" last summer, and bringing some hiking girlfriends who've long wanted to visit. It is truly a special place, and with my Moosewatch experience, I feel able to manage wilderness camping and share my knowledge with others.

Here are my comments:

I am writing to plead that you preserve Bagsund Cabin and the moose study materials/equipment/scientists there. As a science educator, visiting Bagsund Cabin has been the highlight of my Isle Royale experiences. The wolf-moose study is referenced in literally every biology text, everywhere. It has defined predator/prey relationships in ecosystems for scientists and students around the world. It is a critical piece of our human experience in understanding undisturbed ecosystems. It has to be preserved as a working laboratory environment as part of our ecological heritage. The experience of meeting and talking with scientists in residence, who humbly and openly welcome all visitors while sharing their world-famous research, is priceless and can only exist in such a wild and remote location. It's a key piece of the charm and allure and importance of Isle Royale. It has to be maintained.

I understand that visitation has increased, and I'd like to see another campground within a day's hike of Rock Harbor to alleviate crowding at Rock Harbor, 3 Mile, and Daisy Farm. While no one really wants to experience "crowds"; at Isle Royale, the experience of visiting and camping there is important in developing the next generation of citizens who will fight to preserve wilderness areas, including teens and preteens who visit as Scouts and other groups.

More concerning that numbers of people are the stories I'm hearing about people who don't practice "leave no trace" camping. One of the very best parts of Isle Royale has been that the people I've encountered have been genuine, caring, and careful stewards. Until now visitation has been somewhat self-limited by the difficulty and expense of arriving on the island, but I'd like to see visitor education and enforcement increase to preserve the "human" environment by doing more than just "hinting" at what's expected. Those talks on the dock could be a lot more informative and more forceful. Setting those cultural norms is needed, because not everyone arrives with them in place. (Take it from someone with 30 years experience in managing group behavior - set those expectations up front!)

My only experience with unruly, loud campers has been from boaters arriving from the Keewenaw during calm conditions. You might consider managing where boaters can arrive and dock and again, that education piece needs to be explicit because clearly people don't just "know"; the culture of no-trace camping.

In conclusion, I absolutely support the historic preservation of Bagsund Cabin and believe it should remain a working science station - it is a key piece of the culture of the island. I would support another campground or two to relieve crowding, and I highly support increased visitor education and enforcement of cultural norms of wilderness camping.

Thank you.

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

Hello,

I am writing to express my wishes to preserve and protect Bagsund Cabin and the wolf-moose study in the strongest possible terms. The wolf-moose study is the hallmark of predator-prey relationship academia and is taught worldwide as a sterling example of the fundamental ecological science, as well as a prominent example of well-designed academic research. As a Michigan Tech alumna and PhD, it is the most pure example of science at its greatest. Its contributions to our collective knowledge are unprecedented; the connection that the pioneers and experts of this field are willing to form with the public is unmatched. It is a gift that the Petersons give of themselves to the public - teaching visitors, interacting with visitors, and reinforcing the belief that humans too, are good animals. Destruction of such a landmark would be an atrocious insult to the spirit of national parks and the pursuit of knowledge. Allowing such a landmark to decay would be similarly insulting to an academic institution that gives so much to the world while asking so little in return. As Candy Peterson herself says, humans are good animals. Please don't prove her wrong by destroying such an important source of knowledge, joy, and humanity.

Thank you,
Beth Meier

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 73

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Correspondence Text

I have been fortunate to live in Bangsund Cabin during summers ever since 1971. At first, I served as my husband's research assistant, and for 15 years I was raising our children, but around 1999 I was ready to welcome visitors to the site. For one thing, the bone collection had become quite impressive, and since the project has always been supported by taxpayers, I felt an obligation to share what we were learning with interested visitors. In 2018, 2070 people signed our guest book.

Since 1974 I have kept a journal, which I've digitized, and this could serve as an additional resource for visitors to Bangsund Cabin. We have, on two occasions, been visited by members of the Bangsund family, and we have some historic photos which I share with anyone who is interested. We are grateful that the cabin was built, and we do our best to care for it.

I would like for every Isle Royale visitor to have a "transformative experience" in the park. Now that wolves have been restored, Isle Royale is a complete ecosystem, and we humans, who have made some pretty bad mistakes, are justified in taking some credit for doing the right thing on the island. I encourage visitors to feel we are part of the blessing of creation and I try to inspire them to get involved in caring for their home communities.

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 74

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Correspondence Text

We find it a little difficult to comment on the proposed Environmental Impact Statement for Isle Royale's Wilderness Stewardship Plan based only on the short descriptions in the (PEPC) Planning, Environment & Public Comment document. That said we will weigh in with our thoughts based on what we have seen.

As active cruising boaters, we've visited Isle Royale untold numbers of times over the years, our first trip to Isle Royale being in the mid-1970's. In each case we've travelled to the park via our own personal vessel, making the transit from the Bayfield Wisconsin area back and forth to the park. Until 2018 our trips have been via Sailboat. In 2018 we purchased a cruising powerboat and have since made two trips to the island with that boat, our visits curtailed a bit by COVID-19 considerations. We deeply appreciate and value the Island for its rich wilderness hiking trails and many secure wilderness anchorages and docks for boater access.

Of the three options summarized in the public comment document, we would strongly favor option A (no action), or possibly option B (Enhance the park's wilderness character with specific emphasis on improving the wilderness experience while maintaining Isle Royale's natural and untrammelled wilderness qualities), although what that means to park access is not clear at this time.

We do not feel option C (Enhance the park's wilderness character by focusing primarily on improving solitude) is necessary or currently advisable. We say this because we have never seen situations where the solitude of the park is being disturbed under the current provisions. We're particularly concerned about the potential reduction to boater access under this option, particularly as the only access to this park is by water excepting float plane access which may be an issue for some (we would argue that it is NOT an issue).

Except in some possible rare exceptions, those visiting the island, either boaters or hikers, tend to have an immense respect for the pristine wilderness experience offered by the park, and treat this jewel that is Isle Royale accordingly. Plus, the very limited accommodations for overnighting on the island (the various wilderness shelters and Rock Harbor Lodge), offer needed accommodation to those for which true wilderness camping would not be an option because of age or physical limitations. It's important that the park be accessible to the widest possible numbers of people while keeping true to the wilderness area which is the primary draw of Isle Royale. We believe current regulations provide a good balance in that regard.

After being directly engaged in the last General Management Plan update several years ago, we appreciate the park's need to examine a wide range of planning options, but also feel that last planning effort (resulting in today's park management plan) struck about the right balance and should be continued with limited adjustments to address any specific issues not being adequately addressed now. Option C concerns us because it seems to be moving toward a park plan focusing solely on its wilderness aspects while minimizing, even limiting, visitor access in potentially extreme ways. That is not what a National Park is all about.

In closing, we might add that we're active member of the Great Lakes Cruising Club, an organization of roughly 2500 cruising boaters across the Great Lakes in both the U.S. and Canada. Bill recently stepped off the Board of Directors for the organization after serving 10-years as a Director. We remain deeply engaged with the club. As such we would be more than happy to help coordinate review and planning efforts by our club's members, many of whom like us are frequent visitors to the island.

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

Our family really enjoyed visiting the Bangsund research station and was one of our most favorite parts of our visit to Isle Royale. The professors were so giving of their time and spent almost an hour with our kids looking at the moose skeletons with them. As a former Biology major, I was delighted to see the interest that was sparked in our kids through some of the research team that was presented here. It would be such a valuable study to continue to share with the public and we are so grateful to have gotten to spend some time here. We are hopeful that this important research will continue and be shared with the visitors at Isle Royale!

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

I recently visited the Bangsund Cabin during a kayak excursion I was on in July. I have to say, learning from Candy & Rolf was definitely a highlight of my 3 days at Isle Royale. The depth of knowledge this research center has and the ability to experience it at location made this so much more impactful. This same center could be at a museum or something, but it would lose the connection it has to the land. We saw a dead moose on our trip and we learned that Candy and Rolf were already tracking it and researching it. We also saw a live moose we were able to discuss with them. Learning about the research and trends of the wolves is fascinating and to have their dedication as researchers for such a long period of time makes this place so special. I hope that this work is passed on to others who are able to keep it going. I do appreciate the idea of keeping Isle Royale as much wilderness as possible. However, I do think the hotels, motor boats, visitor centers and the large area for staff housing is the most impactful to the visitor experience for solitude. I think a research center such as theirs really benefits the public and their willingness to educate those that come their way and I believe it should be preserved in the best way possible for the future.

I do like the idea of expanding some of the campsites to add more options, if that can be done relatively low impact. When I was there the outhouses were really, really gross. I'd hope some additional consideration could be looked at for how they are maintained. I understand it's an outhouse, but this was also preventative maintenance that should have been looked at prior to the main season.

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Correspondence Text

Seems like Alternative A would be best. "B" means "more" people and less "peace" while "C" is simply punitive and removes the wilderness access to all except those who "cue-up" to jump on reservation websites. Its a wonderful place and has never seemed to be over-used or over-crowded. Let's not mess with it. Thank you.

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

Regarding the three options A, B or C for Isle Royale wilderness planning, I think options A and B are to be preferred. C might lead to an overly restrictive management mentality where the only living things are the moose, the wolves and a few dedicated and extremely fit wilderness enthusiasts. I think having reasonable access for visitors, most of whom are looking for complete solitude, is important for maintaining support for the park system. I have visited the park only three times, always by sailboat. It would be a shame if restrictive policies about boat anchoring were instituted which would prevent us cruisers from enjoying the park.

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

Bang Gund Research Station needs to be preserved or stabilized. It is an excellent location for citizens to learn about the moose and wolves of Isle Royale and is historically significant.

I am in favor of Alternate A or B but not of C. While visitation numbers have been trending up in recent years, and July and August can be busy, more is needed to require a reservation system. I'm also in favor of increasing funding for the park so that more employees can be hired and things like trails can be better maintained.

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

With over 30 years of backpacking IRNP, I have seen an increased use of campgrounds to the point that outhouses and campgrounds are being heavily used. Last year the outhouse at Huginnin Cove was nearing replacement with a spongy floor and full latrine. Multiple groups occupying single campsites at various campgrounds are frequently discussed among campers. An updated computer/ reservation system for camping on IRNP is desperately needed. As we see in other National Parks, this may help prevent overcrowding but also limit campers to their scheduled itineraries.

The possibility of opening a new trail to connect Chippewa Harbor to Malone Bay along the southern end of the island could help the overcrowding that is seen in the interior central campsites near Lake Ritchie and Chickenbone Lake. The frequency of the Blue Green Algae blooms, although naturally occurring, do pose a health threat and concern for campers. Closing East Chickenbone and perhaps opening a campsite near Sargent Lake might be an option. Many backcountry campers are already bushwhacking their way to Sargent Lake.

With regards to preservation of existing buildings, I think we should preserve Edison Fishery/ Rock Harbor Lighthouse/ Bangsund Cabin area, and the lighthouses of Passage Island, Menagerie Island, Rock of Ages. Opening up more tours to these landmarks could also generate income to help preserve them. Many visitors are aging and backpacking is not something they are able to do. They do have the interest and time to visit the historical sites of Isle Royale National Park as long as even trails, railings and bridging are in place for their use (ADA compliancy).

Recent years have brought the threat of wildfires to the forefront. Preparation for emergencies have improved. Backcountry permits have been given to lessen the crowding in campgrounds but have also elevated the risk of wildfire. Limiting the use of twig stoves, campfires and backcountry permits maybe in order, as well as other forest management practices such as prescribed burns to reduce the amount of

deadfall could be considered.

Finally the need for no-trace camping education should be required before permits are issued. There should not be a self-registration process for backpackers being first-time visitors to IRNP. Camper etiquette education should also be included especially with groups.

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

Hello,

First of all, thank you for maintaining this pristine beauty we call Isle Royale NP. I was fortunate to spend 6 days backpacking and kayaking this past August with my two college roommates. We are now in our mid-60's and enjoyed every minute. Arriving at Rock Harbor took me back in time to the days when fortune hunters arrived in Dyea and Skagway on their way to the Klondike. We found our fortune rekindling our lifelong friendship.

My comments will fall somewhere between alternatives A & B. Keeping IR as unspoiled and rugged as possible but adding a few more backpacking options.

Keep everything nearly the same, regulate the number of visitors and group sizes but add a few more backcountry campsites to the present locations and add looped hiking trails to those backcountry campsites similar to the Scoville Point trail out of Rock Harbor. Increasing the backcountry camping stays to two nights so backpackers can enjoy the a relaxing looped hike without worrying about getting to the next destination to secure a place to camp. Admittedly this may not be as needed in the truly remote "backcountry" campsites with fewer visitors.

Thanks for the privilege,

David Shea

PEPC Project ID: 109183, DocumentID: 120003

Correspondence: 82

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Correspondence Text

Dear Superintendent Swanke,

America's National Parks are our country's Crown Jewels and deserve to be safeguarded as such. Their beauty, historical significance and educational value are without parallel. As a former concessions employee I spent all or part of 15 summers working on Isle Royale. During that period I interacted with innumerable park visitors, park personnel, summer employees and employees of the various concessions. Additionally when not working on the island I would often return to visit with family members, domestic friends and international friends. It was a fantastic experience that provided me with memories and stories that I will enjoy the rest of my life and which has earned me the envy of friends and acquaintances.

Isle Royale has been identified and set aside for the enjoyment of our citizens and guests and to give them hands-on experience that should encourage them to be good stewards of our environment and wildlife populations. Additionally they can enhance their understanding of our northern history by wandering through historical buildings and sites depicting early life in the north.

With respect to the Draft Alternative Concepts:

Alternative A (No Action) - is not a good choice because it doesn't give the Isle Royale Park Service license to oversee critical wilderness and historical concerns.

Alternative C is too restrictive. I see it as restricting certain individuals access to the island. Those people have a right to be able to enjoy the parts of the island that interests them and/or that they are physically able to travel to.

Alternative B, of the three alternatives, seems to be a reasonable start but it doesn't mention Commercial Activities and it doesn't say where the 81 acres of potential wilderness are and why it is important to convert them to a wilderness status. I like the idea of adding facilities and trails and improving Historic structures for hikers. However, I don't see any mention of improving options for day-trippers, boaters, fishermen and access to hard-to-access historical sites and the beauty of the shoreline. All park and concession employees need to always remember that they are there to serve park visitors; the park isn't their personal playground. Fishing around the island is great but, regulation modifications should be considered to give the island a reputation for producing trophy fish (reduced limits, catch and release, barbless hooks). Windigo should consider adding activities for day-trippers (charter fishing, boat tours to historical sites in Washington Harbor and Rock of Ages Light House, perhaps more kayak and canoe rentals and more lodging options). The island coastline is magnificent, weather permitting, perhaps small boat tours could be arranged to view Chippewa Harbor, McCargo Cove, Amygdaloid Island, Crystal Cove, Tobin Harbor, etc. All of the options I have suggested, I think, would enhance the islands reputation, encourage more visitation and would not add to the impairment of the wilderness.

I wish you success in your worthy goal.

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

To whom it may concern,

As an avid backpacker and wilderness explorer, and a two time visitor to ISRO, I want to emphasize how amazing the park is right now in its current management. I particularly love the solitude the island already cultivates. I love the campgrounds and their facilities. I believe the No-Action Alternative is the best way to proceed because I particularly enjoy everything about the experience the island currently offers.

I have visited twice as a backpacker and have spent a total of 13 nights on the island. Someday, I hope to explore more of the archipelago by watercraft.

I love ISRO!

Doug Hammond

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Given the three alternatives, I support Alternative B, with the following comments.

I don't care to see enlargement of existing campgrounds, but would support new campgrounds, in an effort to disperse campers and reduce gathering / group sizes. I believe that the wilderness experience includes limited interaction with other visitors. If new campgrounds are created, please keep sites apart from each other to limit interaction with others. I would also support new trails to get to those new campgrounds.

A note about visitors. While I encourage everyone to visit Isle Royale, I would propose limiting the number of concurrent visitors to an amount that results in maintaining the wilderness experience. My two visits in 2016 and 2022 were very different experiences; both in late September but to opposite ends of the island. In 2016 we saw 1-2 other visitors each day of our 5-day visit. In 2022 we saw many many visitors while on the trail and in camp.

Another thing to consider is the recent increase in capacity of the Isle Royale Seaplanes concession. In 2016 they operated one aircraft out of the Houghton County airport. In 2022 they operated four aircraft (three Beavers, one Cessna 206) from the Portage Canal. While on the island, we could often hear the seaplane coming and going. I know they are not supposed to fly over the island but they can still be heard! While I have used ISR for transportation for both of my visits and I support their commercial concession, I don't want to see their business model expand and in fact would like to see it reduced a bit.

We also noticed frequent scheduled commercial commuter aircraft traffic over the island, specifically turbo-prop aircraft, presumably operating out of Thunder Bay Ontario. Is there any way to coordinate with FAA air traffic control to eliminate or reduce commercial traffic over the island? Jets operating at

high altitudes could be seen but generally not heard, but these commuter turbo-props were droning over the island morning to night.

Please help to keep Isle Royale a wilderness National Park and preserve the natural experience with limited infrastructure and limited exposure to other visitors. There are so few places left where we can enjoy such an environment.

Thank you very much!

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Correspondence Text

November 10, 2022

Thank you, Superintendent Denice Swanke for taking on this important planning effort and finalizing the Wilderness Stewardship Plan (WSP) for Isle Royale National Park (IRNP). My husband and I have visited Isle Royale National Park several times each year in our personal boat for the last half dozen years; once we used front country camping shelters for a couple of overnights but usually anchor in a quiet bay; and I have backpacked and camped for one overnight. We travel to Isle Royale for the wilderness experience and opportunity to soak in the natural beauty, breath in the peace and quiet, be gifted with wildlife sightings, and hike the trails on the Island.

We have learned it is best not to travel to the Island mid-July through August due to the throngs of people pouring onto the Island in the peak of ferry and plane season. Most trips, we do get to Rock Harbor and Windigo, and points in between, hiking the trails as we circumnavigate the Island in our boat. We typically enjoy interacting with the other hikers willing to chat about their trip and experiences. As such, we have experienced, observed and/or learned quite a bit during the years when visitation to the park has been higher than previous years.

I made a point of reviewing the 1998 General Management Plan (GMP) and the 2019 Cultural Resource Management Plan (CRMP) in attempt to learn and develop substantive comments for your planning efforts a/o park management. I do encourage development of a third action alternative for the selected alternative since I see aspects that could be blended into a hybrid alternative.

MANAGING THE NUMBER OF DISEMBARKING VISITORS VIA PLANE AND FERRY

Except for the COVID year when the ferries did not run, we have thought the Island was quite busy

with the multitude of people arriving at either end in the ferries and via the sea planes that come and go on a regular basis throughout each day. I do see that visitation to the Island has been relatively higher in years we have visited. The 2022 season seemed exceptionally busy. However, there was clearly less boating traffic throughout the season, probably due to higher gas prices. With first hand observations in mind over the last half dozen years with higher visitation to the park overall, it seems that if you more closely managed the number of people who arrive and disembark per day via ferry or via plane, you could more closely achieve the wilderness experience you are attempting to create on the trails and in the campgrounds. In the years my husband and I visited the Island in our personal boat, our experience was that the hiking trails were filled with hikers and some of the resting points were actually clogged with hikers milling about. As such, I again suggest your selected alternative should include some method of managing the number of disembarking backpackers and day users who disembark from the ferries and the planes.

ADDITIONAL ACCESS AS DESCRIBED FOR ALTERNATIVE B

With the amount of maintenance needed including deferred maintenance for shelters, outhouses, docks and trails, the idea of additional trails and campgrounds does not seem to be a realistic alternative as much as I would support it. However, if IRNP could create improvements on the existing infrastructure as well as building and maintaining new, then this is definitely a component of the selected alternative. Whether you add new infrastructure or not, the method of expanding capacity at existing sites for more tenting seems like a low-cost method for any action alternative.

IMPROVING SOLITUDE AS DESCRIBED BY ALTERNATIVE C

Decreasing Day Use Group Size AND Capping the Maximum Number of Day Users/Day: One of the positive aspects of visiting IRNP is the opportunity to see and interact with visitors who exhibit the full range of abilities to enjoy the Island. It would be unfortunate if an unintended consequence would be to eliminate this user group; however, limiting the size of a day use group and the numbers of day users disembarking at both Windigo and Rock Harbor at one time to the Island is a likely method to assist in managing wilderness character and opportunities for solitude. After seeing how crazy busy Rock Harbor can be while the ferries ran and the planes arrived and departed throughout the season, the idea of limiting the size of any one particular day use group makes complete sense. We pass hikers all the time while on the trails and four visitors or less per group is less impactful to others on the trail and to the trail itself as each group chats instead of yells at each other; or each group is able to move off the trail to stop and rest without it damaging adjacent vegetation or widening the trail.

In addition to limiting the size of each day use group, it is a good time to begin to manage the number of day users at any one time on the Island as a means of managing wilderness character. I have gasped at the numbers shared over the radio by the Isle Royale Queen to Rock Harbor on the number of lodge stayers, backpackers and day users about to disembark from the ferry at the SAME time. Just because a particular ferry can carry a certain number of passengers does not mean IRNP needs to receive all those visitors at the same time. A limit to number of day users who arrive via plane is also necessary. Without either limit, some of this effort to improve wilderness character and the opportunity for solitude seems a bit hollow.

Group size and Organizational Groups: Reduce group size limit to six people per group instead of ten. Continue to restrict the number of times any one particular organizational group can backpack the Island in a season. Continue to require AND enforce that groups from the same organization travel different itineraries. Please note we have seen organizational groups that do not follow this expectation of traveling separate itineraries. More than once we have crossed 20 people from the same organization

on a trail; the disruption of these raucous and unmanaged youth on the trail in addition to the disruptions in campgrounds is quite anti-wilderness character and anti-solitude.

Visitor access to the park: As the GMP itself makes note, a more primitive wilderness experience with quiet and solitude could be managed by the number of flights and the number of ferry trips per week. This seems like the best way to manage the opportunity for solitude rather than using a camping permit or campground reservations system. In addition, adding a reservation system for campgrounds will likely add yet another cost to a trip to IRNP thereby making it only available to those with abundant disposal income which seems like an issue of social justice or an issue of fairness to access the Island for those who do not have abundant disposable income.

Backpacker travel patterns: Limiting the ability to day trip from the same campground for successive nights in a row could assist with the flow of campers through the campgrounds. If not this, then possibly lower the number of successive nights one can stay in any one campground to a lesser number. We spoke to backpackers several times at Daisy Farm and at Moskey Basin who traveled no further than to these locations, and then day tripped for the next two to three to four days. This mode of travel clogs the campgrounds so those who travel overland from the interior may have problems securing a campsite as was evidenced to us when a backpacker pitched their tent in the adjacent area of the Moskey Basin dock which was clearly not part of the campground. Whatever restrictions you apply or systems you decide to have visitors use, the cross-Island backpacker should be given priority in any camping reservation system.

Reducing the number of campsites in a campground, eliminating trails: With park visitation as high as it has been these last several years, I am not clear how reducing the number of campsites or eliminating trails would actually improve the opportunity for solitude unless it is directly tied to reducing the number of people arriving to the Island every day. Otherwise, this seems nothing more than a component of an alternative to compare effects of the alternatives. This is not a component of the selected alternative I would support in any way.

Winter Public Use: Without a doubt a winter experience on Isle Royale would be the ultimate in a wilderness experience. However, this could be nothing more than a burden to the NPS or worse, the US Coast Guard when a winter rescue in the middle of Lake Superior is needed. Therefore, if you open the park to winter use, you must require some kind of accountability from the visitor(s) in terms of experience, preparedness, self-sufficiency and self-reliance. Requirements for winter use a/o self-sufficiency and self-reliance could include but are not limited to: a maximum stay limit without requiring re-supply such as a five-day limit; a required equipment expectation including quantity of food per person per day; a one trip limit to all the members of the group per winter season including "guides"; a maximum group size such as four people or less; a 100% pack it in and pack it out requirement, including human waste; and a fee held in escrow in case of rescue or proof of a pre-arranged rescue by a private company. Without these requirements winter and wilderness enthusiasts a/o zealots could make a circus of this very cool opportunity. I can see the book title now.... "Conquering the rock, a winter on Isle Royale on Lake Superior in the worst winter ever.... " If you cannot develop such criteria as I mention here, then I would not support the park being open year round. While 'protecting' the visitor is important if you open the park in winter, it is important to point out that the rationale in your own GMP for closing the park in winter is to protect wildlife and to protect employees. So, your effects analysis and mitigation measures should address these as well.

CABINS IN GENERAL AND SOME SPECIFICS

Even though I think this is the plan, I would like to take this opportunity to emphasize that it is time for the special use permits of descendants of life lease holders to be terminated, not to be renewed, and to have these areas be freely accessible to park visitors. It is time for these properties to be available for public use and enjoyment and not just for the exclusive use of the life lease descendants. The "private dock" signage on a dock on Washington Island is a sore reminder that some believe they have a life right to enjoy public land on Isle Royale like it is still their own private property.

For the Tobin area cabins, designate the potential wilderness as non-wilderness, select one or two cabins that are in the best condition and representative of the era, and provide interpretive opportunities to park visitors for those one or two cabins. The area is already adjacent to a busy, non-wilderness area of the Island so it would blend in and there would be less conflict. Allow the remainder of the cabins in the Tobin area to return to the earth like several other cabins already are once proper consultation and documentation with the State Historic Preservation Officer (SHPO) is concluded. One cabin for an Artist-In-Residence seems to be a sufficient number for such use in that area. And possibly, one cabin could be volunteer housing as long as it is not just for the family volunteers or descendants of life lease holder who used to own that very cabin.

Historic Cabins and infrastructure at Fisherman's Home, Crystal Cove and Holte Fishery are additional interpretive opportunities BUT these areas which are currently designated as potential wilderness should be designated as wilderness. Once designated as wilderness for Fisherman's Home, Crystal Cove and the Holte Fishery, this would then mean remaining as day use only to visit the structures, no generator use nearby, and passive interpretation on each for the short term while allowing these structures including the docks to return to the earth. These areas are in wilderness bays, and could provide the peace and solitude experiences of wilderness. Consult with the SHPO as required and conduct any minimum requirements analysis for allowing the structures to remain and then allow the structures to disintegrate into the wilderness.

PROHIBIT USE TO ENSURE UNNATURAL SOUNDS OF MAN ARE MINIMAL OR ELIMINATED

While your letter did not seem to highlight addressing the unnatural 'sounds' of man in the wilderness or sounds that don't appear to be part of the tradition of Isle Royale, we wish to ask you to consider additional restrictions for noise producing sounds that carry across water and through the forest and into the wilderness. These very sounds scare wildlife; thereby influencing their natural behavior while these same unnatural man-made sounds also impinge on the wilderness character and experiences of others who are nearby.

With this in mind, please consider prohibiting generator use on boats. If not completely prohibiting it, then at least, at a minimum, reduce the hours to a lesser range of time in a given day. The current range of time from 6 a.m. to 10 p.m. for generator use is excessive and impactful to wildlife among other things already mentioned. Please consider a later time for the start of generator use such as 11 a.m. to an earlier end time such as 6 p.m. IF you must allow generators on boats at all. Additionally, please prohibit the use of music amplifying devices of any kind, anywhere. We have been invaded by music of boaters blaring it from their boat as well as lodge stayers in the efficiency apartments at Tobin, in addition to hikers listening to music via their phone speaker while hiking the trails. We know there are limitations to such uses now; however, they are not sufficient enough so that everyone can enjoy the peace and quiet of the wilderness. These prohibitions or limits can be a component of all action alternatives.

EDUCATIONAL NEED FOR ENHANCING WILDERNESS CHARACTER

Additional education to all users about wilderness and wilderness character including the ability for sound to travel in what could be a pristine natural setting is really needed for Isle Royale visitors. Loud talking, even yelling is a common affliction. In such a noisy society, some kind of education and enforcement of prohibitions may have to happen when on the Island. Enforcement is needed in order for any one person to be able to enjoy the peace and the quiet that could be available if everyone just shut off their man-made noise producing devices, quieted their voices and listened to the natural sounds surrounding them. Any educational opportunity like this can be part of any action alternative.

I ask that you keep my contact information private and I thank you for your time, due diligence and caretaking of Isle Royale National Park,
Nancy Larson

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Correspondence Text

Properly maintain and preserve all historic structures. They are an integral part of the park's history.

Option A please. Allow visitors the already acceptable areas.

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I support Option B, with the modest expansion of wilderness status and - hopefully - a desire to stabilize and preserve historic structures. The historic buildings and other structures add character and a depth of appreciation to the experience of visiting Isle Royale. When bringing my kids to the park, the history of the place was brought to life by the ability to see, touch, and walk through various structures or elements of human presence. Whether a light house, research station, or former home, each helped provide insight into the unique characteristics of Isle Royale.

I am not a proponent of Option C. Isle Royale receives comparatively few visitors and the idea of restricting those who do make the journey feels misplaced in this instance.

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Correspondence Text

Thank You for requesting comments /inputs on your proposal (s).

Myself and Our family have been fortunate & privileged in being Visitors and Workers in IRNP over 60 years.

We've Traveled to the park using private & public water & air transportation, Mission 66 was just underway when we began these wilderness experiences in and around isle Royale. The trail hiking ,and non trail hiking, Berry picking& portages & paddling kept us busy and always kept our imaginations wondering.

"A" and "B" are too complex for me to comment except for one. When you develop &/or maintain rails lease keep Signage to a Minimum. It is and has been a Wilderness. Please don't let it become a plethora of information.

Concerning C,

IRNPark is the least visited N.P.

My Opinion is that IR Does Not Need proposed & restricted solitude. acreage. IS IT recorded that Teddy Rosevelt offended his neighbors when he let go a whoop n holler in the ND badlands?

Please!

visitors come to IR partly because ofSolitude . Restricting Generators near or on water after hours has in my opinion been generally maintained.

PEPC Project ID: 109183, DocumentID: 120003

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Correspondence Text

Good morning. I'm Doug Jackson and I'm the Commodore of the Great Lakes Cruising Club. The GLCC is an organization of boaters who cruise the Great Lakes. We have 2,500 members. Some of the member's favorite cruising grounds include the North Channel (Lake Huron), the Apostle Islands and of course Isle Royale. I've had conversations with several Lake Superior members over the past few days who have visited Isle Royale on many occasions and love the remote wilderness resource.

After reviewing your alternatives, the GLCC feels Option A and/or B are in the best interest of our members and the public in general.

From our perspective, it's important that the park be accessible to the widest possible numbers of people while keeping true to the wilderness area which is the primary draw of Isle Royale. We believe the current regulations provide a good balance in that regard. We also feel, for the most part, those visiting the island, either boaters and/or hikers, tend to have great respect for the pristine wilderness and treat the park accordingly.

We would oppose any changes that limited access of our boating members to Isle Royale. Our members want the remote wilderness to remain yet allow for access to enjoy the experience.

Doug Jackson, Commodore, Great Lakes Cruising Club

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Correspondence Text

November 12, 2022

Comments on Preliminary Draft Alternative Concepts by David W. Hand

1) What other alternatives, alternative elements, or management tools should be considered?

a) Shelters for visitors have been a part of the Isle Royale experience since the start of the park.

Increase and maintain shelters in both wilderness and non-wilderness areas.

b) Docks need to be considered historical structures and are not mentioned as such in NPS documents.

2) What issues should be considered when evaluating future stewardship of wilderness at Isle Royale?

a. Crystal Cove, Captain Kidd Island, Johnson Island, and the Holt Fishery at Wright Island are not accessible to hikers which are the vast majority of visitors to IR. These islands are only visited by few boaters and paddlers. The structures in these places should be either preserved or left alone for future archeology. If they pose a danger to the public then they should be fenced off to prevent visitors from entering.

b. Over 99% of the land mass on Isle Royale is designated wilderness. So why is it so crucial to designate the 93-acre potential wilderness as wilderness? What is the harm in leaving it the way it is currently managed?

3) What do you like and dislike about the preliminary alternative concepts, and why?

a. Alternative B - This is my preferred alternative because it provides visitors with the more access and opportunities to enhance their Isle Royale experience and preserve historical structures. In addition, this alternative should include the implementation of more shelters at campgrounds. If you view Isle Royale Facebook Group there are many posts from hikers, paddlers, and boaters that prefer shelters over tent camping. Shelters are a part of the Isle Royale experience. I would also add fixing and maintaining

ALL the docks on Isle Royale.

b. Alternative C - Will not enhance the Isle Royale hiking, paddling, or boating experience. It will restrict people from experiencing the Isle Royale experience by reducing visitation to the island. Getting rid of the shelters and picnic tables to improve the solitude experience is not in the best interest of the majority of visitors as they feel these items are a part of the experience of Isle Royale. For those who oppose the use of picnic tables and shelters they have the option of obtaining backcountry permits and stay out of campgrounds that do not meet their experience. There is room for everyone to enjoy the Isle Royale experience without more regulation and restrictions.

c. Alternative A would be my second choice.

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I would suggest following the no action, plan A, on most items. However, I do think allowing limited public access in winter would be appropriate, especially for studies and solitude options.

An entire new campground, as well as new sites in existing campgrounds seems like the park would begin to lose its remote character. However, I do not support removing existing trails or limiting current access levels, unless if it was for limiting for profit guided tours.

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Alternative B makes no sense. Where will the funding come from to establish, let alone maintain, new trails and camping facilities? Trails have already been falling into disrepair (i.e, Minong) or long ago abandoned (Lake Halloran). Increasing access and use can only lead to more abuse and degradation of the resources. Kayakers have long been ignored as a user group, while the number of people participating in sea kayaking has increased dramatically in the last two decades. Where is the acceptance and balance for this user group? If no consideration to build and maintain shelters specifically for use by kayakers can be included, it's time to pull the plug and approve Alternative C. Remove the large groups and concessions who, by and large, clutter up the campsites and reduce the wilderness experience for others with noise and lack of ethics. It's also past time to minimize the number of power boats that can use shelters on a given day. On a number of occasions I have had negative encounters with boaters (Beaver Island, Grace Island, Siskiwit Bay) who have docked then asked how long we where staying and if they could leave gear and coolers in the shelter we were using, in order to "claiming when we left. Utilizing a permit system can only serve to improve the wilderness and resources by reducing the amount of use and abuse.

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Out of the proposals, I think alternative b makes the most sense to me. I think in coming years, the park will likely see more traffic from tourists. That said, I think the expansion of campgrounds and the addition of a new one, although desirable, should be done in a thoughtful and ecologically sound way to minimize the impact to the wilderness area. The island is a unique learning opportunity and that needs to be maintained so that it remains so while not overly restricting access to this unique resource and I think alternate b does this best. If done correctly, I think this could help minimize man's impact on the wilderness of Isle Royale while maintaining a much a possible access to all.

I do not like the alternate c plan. I think the most troublesome aspect of this is the winter use. I think this could open the NPS and state of Michigan up to liability uses. As I'm sure the staff associated with Isle Royale are full aware, Lake Superior is not to be trifled with start in the the autumn, well into winter. I very much foresee winter access potentially turning deadly, something although always an issue in wilderness areas, I think is something that needs to be minimized as much as possible. With more and more turning to recreation like hiking and backpacking over the years, I think its not a question of if, but when something turns deadly, a phenomenon that has happened with increasing frequency at Pictured Rocks National Lakeshore.

Also as a Michigan Tech alum and scientist, I also wonder what winter public access will do to the longest running predator-prey study that's been conducted on the island for decades now. I think the potential affects of increased contact in the winter months could alter the study and perhaps take some shine away from one of the park's best publicity assets. If left with a choice only between alternative c and alternative a (no-action), I'd much rather the park continue as is..

PEPC Project ID: 109183, DocumentID: 120003

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Isle Royale Park is beautiful and my husband and I cherished our visit there. However, it was incredibly disappointing with how overrun it felt. We completed the Minong Trail from east to west and we're blown away by the amount of people we encountered. Especially when this particular section of trail is so remote, and reportedly, less traveled. Every single night the designated camping areas were full and with groups doubling up. This does not make for a pleasant backcountry experience. It felt much more like a rat race to get a good spot. When I'm all reality that didn't matter since someone else will be sharing your small space by the afternoon anyway. My husband and I both agreed that we would much rather enter a lottery for a permit or use a reservation system and lose out on a spot because we failed to plan far enough ahead rather than repeat our overcrowded experience. Please strongly consider either a lottery or reservation system for designated camping areas so everyone who is there has the opportunity to enjoy that time.

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Comment submitted
By Rolf O. Peterson, Michigan Technological University, Houghton, MI 49931
In response to Notice of Intent to Prepare an Environmental Impact Statement for a Wilderness Stewardship Plan for Isle Royale National Park, Michigan
15 November 2022

How might NPS enhance solitude and wilderness character (opportunities for "unconfined wilderness recreation")?

I suggest the NPS revisit management of the Cross-Country Zones. Currently, over one-third of the main island is closed to camping during May-July. At the request of Superintendent John Morehead in the late 1970s, I was involved in establishing these restrictions. The original basis for the zones was to protect wolf dens and homesites from human disturbance. It was Superintendent Morehead's idea to make closures large, so specific sites would not be identifiable. Decades have passed since the closures were established and, with small additions, they have been relatively unmodified. Over these decades much has been learned about wolf resilience, suggesting that NPS may want to reconsider the need for closed zones to protect wolves. The following points seem pertinent:

- 1) "Seasonal closure of large areas of the Park detracts from the opportunity for unconfined wilderness recreation." (Federal Register 87(203):64093, "large areas" are my additions to text in the Federal Register). With virtually no risk to the resource, the stated objectives of the Wilderness Stewardship Plan could be significantly advanced if closed zones were reduced to only those small areas that were established for reasons unrelated to wolf protection.
- 2) There have been many formal and informal opportunities for biologists to evaluate the effects of human disturbance on wolves, particularly young pups at dens (Frame et al. 2007, Beck et al. 2009, Nonaka, 2011, Ken Mills pers. commun.). While wolf parents almost always moved their pups after

such disturbance, there is no record of any resulting pup mortalities or abandonments, invalidating the original justification for the closures.

3) Currently, and for more than three decades, there are very few cross-country hikers - in fact, we have encountered virtually none during >6,000 miles of cross-country travel by volunteers during 1988-2022. In other words, potential overuse of off-trail areas is not a general concern.

4) The reality of cross-country hiking is that it has become much more difficult in recent decades, because of forest regrowth and an unprecedented wind event in 2010 that felled millions of trees. Consequently, it seems very unlikely that cross-country use is likely to increase in the foreseeable future.

5) In the 1970s Isle Royale was a destination for photographers who might hope to photograph wolves, but now the photographic market has been saturated by opportunities and products from Yellowstone and the Voyageurs' Wolf Project. Today ISRO is not the target destination for would-be wolf photographers that it once was.

Maintain winter closure:

1) Interestingly, winter closure to visitation is part of the aura of ISRO, as represented in the NPCA website "Wilderness of Isle Royale" trip promotion: "The island park is accessible only by boat or seaplane, there are no paved roads, and all the human inhabitants leave in the winter, returning control of the island to its wolves, moose, red squirrels, bats, river otters and loons (sic)." Accessed 5 November 2022.

2) NPS policy allows human activities that do not alter wildlife behavior. Based on the only two known cases of visitor use in winter in the past half-century (1969 and 1985), human use will displace wolves from shorelines and lake surfaces, at the time of year when wolf predation exerts a profound influence on moose survival (Montgomery et al. 2013).

3) Trail marking, NPS staffing, and search-and-rescue capability are inadequate to support visitor use in winter.

Maintain Krefling exclosures in Wilderness

The NPS NOI mentions "fencing". This could be construed as a suggestion to remove the historic moose exclosures established by NPS in a cooperative study involving L. Krefling of the U.S. Fish and Wildlife Service beginning in 1949. Such removal would constitute a major lost opportunity, as these exclosures are virtually unknown to park visitors yet they are a vital demonstration of moose herbivory effects. These four exclosures include the oldest in North America.

Maintain the Bangsund Research Station as it meets the Fifth Wilderness Quality of the Wilderness Act.

SECTION 2 (c) "An area of wilderness...

(4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value." (from the Wilderness Act of 1964).

As NPS Wilderness management policies have continued to evolve, there has been increasing appreciation and a legal foundation for considering designated Wilderness as more than "pristine" landscapes that were little altered by modern human activity. Section 2(c) of the Wilderness Act - the "fifth Wilderness quality - was explicitly incorporated by NPS policies in 2014 (Mudar 2020).

The Bangsund Research Station encompasses all dimensions of "Other Values" specified by the Wilderness Act (e.g., illustrated by a recent statewide TV broadcast at Under the Radar - Michigan episode on Isle Royale! <https://www.youtube.com/watch?v=GdZWZrVWToY>, see minute 7:44). Perhaps no other site at ISRO provides such a comprehensive representation of all aspects of the

"Fifth Value" of the Wilderness Act, a strong basis for preservation.

Scientific. The site has been the center of wolf-moose field research in summer since 1960. The study itself is the ecological research supported for the longest time by the U.S. National Science Foundation (with a few gaps, since 1958), and is the longest predator-prey study ever conducted.

Educational. Coupled with the historic Edisen Fishery and Rock Harbor lighthouse maintained by the NPS, the Bangsund site is a complementary addition to a half-day site visit that can be covered in two short hikes. That >2,000 people did this in 2018 is ample testimony to the public interest in the site, where information is readily available on the scientific findings.

Scenic. "Quaint" and "picturesque" are frequent adjectives we find in the guest book. A quick search on the internet reveals the popularity of the site for amateur and professional photographers, including Q.T. Luong, featured in Ken Burns' The National Parks.

Historic. Three structures at the Bangsund site, including the main cabin, are listed on the National Register of Historic Sites. As explained to visitors on site, the usefulness of the site for human activities spans thousands of years. Over the years, many distinguished guests have visited the site, including one Secretary of the Interior, chiefs and representatives of several indigenous communities, two U.S. Senators, numerous Congressional aides, two directors of the NPS, and several regional NPS directors.

Background on the Bangsund Research Station:

In 1958 and 1959 Purdue University graduate student L. David Mech, tasked with summer field work in the brand-new wolf-moose research, needed a base of operations for fieldwork, following years of planning by Durward Allen of Purdue and Naturalist Robert M. Linn from the Isle Royale NPS staff. Housing at Mott Island proved inadequate to the task in 1958, and the Wright Island site used in 1959 was too far from the logistical hub at Mott Island (Mech 2020). Jack Bangsund passed away late in 1959, and in 1960 Linn helped establish Mech's operation at the Bangsund cabin near the Edisen Fishery. That it remains today as the research base for summer field work by the Michigan Tech wolf-moose study, 62 years later, speaks volumes about the usefulness and significance of the site to the ongoing research.

The reasonable expectation for former commercial fisheries at Isle Royale is that they will slowly fade away and be overtaken by the forest. Given that common fate for such places, the Bangsund site was probably completely overlooked during the development of Wilderness Recommendations by NPS in the 1970s, and almost certainly was ignored in the final Congressional designation (T. Bailey, pers. commun. and Bailey 2018), following hearings in the Senate Interior Committee Public Land Subcommittee, then led by Senator Frank Church. Those hearings, in 1972, saw the NPS proposal presented by Assistant DOI Secretary Nathaniel Reed face off (and largely lose) to a Citizen's Alternative Proposal which greatly reduced the area excluded from Wilderness designation. Tom Bailey, who represented the citizens' group, related that Senator Church, after hearing all the details about NPS-proposed individual exclusions to Wilderness, finally recommended that designated Wilderness be maximized along the lines of the citizens' proposal, which became Public Law 94-567.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

November 15, 2022

VIA ELECTRONIC MAIL ONLY

Ms. Denice Swanke, Superintendent

U.S. Department of the Interior

National Park Service

Isle Royale National Park

800 East Lakeshore Drive

Houghton, Michigan 49931

RE: Scoping Request - Wilderness Stewardship Plan for Isle Royale National Park, Michigan

Dear Superintendent Swanke:

The U.S. Environmental Protection Agency received notice that the National Park Service (Park Service) initiated a public scoping process to update its Wilderness Stewardship Plan for Isle Royale National Park (Park) as part of an Environmental Impact Statement (EIS) under the National Environmental Policy Act (NEPA). This letter provides EPA's early comments on the October 21, 2022 scoping notice pursuant to our authority under NEPA, the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The Park is an island archipelago with roughly 450 smaller islands in the northwest portion of Lake Superior. Approximately 99% of the Park, including 132,018 acres of land, is Federally protected as a wilderness area under the Wilderness Act of 1964. The purpose of the Park as stated in its Foundation Document is to set apart a remote island archipelago and surrounding waters in Lake Superior as a national park for the benefit and enjoyment of the public and to preserve and protect its wilderness character, cultural and natural resources, and ecological processes.

The Park Service seeks to update the Park's 2006 Wilderness Stewardship Plan to more proactively manage wilderness conditions caused by changes in backcountry use, management actions, increasing visitation, and associated human-caused adverse impacts. The scoping notice indicates three alternatives are being considered to improve visitors' experiences while enhancing wilderness character and maintaining the Park's natural and untrammelled qualities. The no action alternative describes the continuation of existing management activities. The first action alternative would increase public access by adding trails, a new campground, and more campsites in existing campgrounds. Group sizes would be limited and people would need advanced reservations to use campsites. The second action alternative focuses on enhancing wilderness character while improving solitude. It would decrease day use group size, reduce campsites, eliminate trails and commercial uses, remove structures, allow winter public use, and implement a camping permit system. Both action alternatives would determine the preservation, use, or removal of historic structures in potential and designated wilderness areas.

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Please find our scoping recommendations]related to aquatic resources, species, air quality, and other topics within the enclosed (1) Detailed Scoping Comments and (2) Construction Emission Control Checklist. We recognize scoping and other early coordination as an efficient means to resolve potential issues upfront, facilitate accelerated project timelines, inform project decision-making, and improve project outcomes. As such, we appreciate the opportunity to be involved at these early stages of project development.

Please send electronic versions of future correspondence related to the NEPA process for this project, including the Draft and Final EIS, to me at the above address. Thank you for the opportunity to review this project. When the Draft EIS becomes available, please send an electronic copy to Kathy Kowal, the lead reviewer for this project, at kowal.kathleen@epa.gov. Ms. Kowal is also available at 312-353-5206.

Sincerely,

Kathy Triantafyllou Acting NEPA Section Supervisor Tribal and Multi-media Programs Office Office of the Regional Administrator cc: Scott Hicks, U.S. Fish and Wildlife Service
Casey Reitz, Michigan Department of Natural Resources, Wildlife Division

Enclosures: Detailed Scoping Comments

Construction Emission Control Checklist

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Enclosure 1

EPA'S DETAILED SCOPING COMMENTS REGARDING
WILDERNESS STEWARDSHIP PLAN FOR
ISLE ROYALE NATIONAL PARK

November 21, 2022

Reconciling Proposed Alternatives with Requirements under the Wilderness Act of 1964

Scoping information indicates a preliminary inventory and monitoring of wilderness and backcountry resources show a difference between existing and desired ecological conditions. Changes in backcountry use, management actions, increasing visitation, and associated human-caused adverse impacts suggest an underlying need to more proactively manage human activities that directly or indirectly affect wilderness conditions. In describing the potential need for changes in access, maintenance, management practices, and treatment of historic and cultural resources, EPA recommends the Draft EIS include:

- ♣ a detailed characterization of the island's ecosystem. Information pertaining to the current, as well as desired condition, is necessary to understand impacts to flora and fauna as well as visitors' experiences.
- ♣ A quantification of recent and projected visitation numbers, along with corresponding potential increases or decreases in the development and use of trails, concessions, camping accommodations, and

historic structures for operational purposes. While the scoping document includes potential limits on group sizes, additional information on the number of users in each action alternative and the “no action” baseline will allow a clearer comparison of the magnitude of anticipated uses and impacts on natural systems.

- ♣ areas where new trails and accommodations would be expanded, relocated or reduced under each alternative to provide context regarding whether proposed alternatives would diminish or benefit the untrammeled, natural, and undeveloped quality of the wilderness and the potential for visitors to experience solitude.

- ♣ exhibits or aerial photography to show areas where access opportunities (e.g., new trails/accommodations) would be expanded, relocated or reduced under each alternative.

Relationship with Other Projects

The Draft EIS should consider how proposed alternatives would influence other existing projects and ecological initiatives in the Park.

- ♣ In 2018, the Park Service finalized an EIS and released a Record of Decision that approved the reintroduction of gray wolves to the Park over a three to five-year period to stabilize the resident moose population, while minimizing impacts to the untrammeled quality of the wilderness. The Final EIS indicated there could be changes in the number, frequency, and location of temporary closures of certain areas to protect wolf habitat.

When analyzing impacts of alternatives in the Draft EIS, potential stressors and benefits due to changes in visitor access, trail relocations, and campgrounds should be analyzed in relation to the wolf reintroduction project and the evolving health of the island ecosystem. The Draft EIS should evaluate how climate change potentially could compound impacts and the likelihood of success for both wolf reintroduction and wilderness management.

- ♣ In 1981, the United Nations designated the Park as an International Biosphere Preserve. The United Nations Educational, Scientific, and Cultural Organization describes the park as

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presenting “outstanding possibilities for research in a remote ecosystem where human influences are limited” (UNESCO 2016). The Park is widely known to be part of the longest running study of a predator-prey system in the world. Since the Park Service has attributed this in large part to existing restrictions on public access and management, the Draft EIS should consider how potential impacts from proposed alternatives could impact the Park's global scientific and educational significance.

Water Quality and Wetlands

Aquatic resources are an integral part of the island ecosystem, with resident moose and beaver relying on the availability of high quality water resources. EPA recommends the Draft EIS include information concerning direct, indirect, and cumulative impacts to water quality and wetlands in the Park from constructing, operating, and maintaining camping facilities, trails, and other forms of access. We recommend following the sequencing established by the Clean Water Act Section 404(b)(1) guidelines of avoidance first, minimization, then mitigation for unavoidable, minimized impacts.

In addition, the Draft EIS should discuss best practices for protecting water quality that can be used during any management activities.

Climate Resiliency

The U.S. Global Change Research Program's National Climate Assessment (NCA)¹ provides information valuable to determining how changing climate could affect the Park and how the project could be made more resilient to the impacts of climate change. The NCA's section on the Midwest is a useful starting place for analyzing changing climate conditions. The report finds that, in the Midwest, extreme heat, heavy downpours, and flooding will affect infrastructure, health, and air/water quality. EPA recommends the Draft EIS:

- ♣ include a discussion of reasonably foreseeable effects that changes in climate may have on the Park and how this information is incorporated into proposed actions and shapes measures to improve the resilience of project features. See EPA's Adaptation Resource Center² for additional information.
- ♣ discuss whether an adaptive management plan will be drafted to ensure 1) project components maintain structural integrity under changing conditions and 2) a healthy ecosystem is maintained. Describe triggers for changing management approaches if built or natural features veer from desired conditions.

Management of Historic, Architectural, Archaeological, and Cultural Resources

The 2011 Wilderness and Backcountry Management Plan and Final EIS did not result in a decision for management of historic structures in potential and designated wilderness areas. EPA recognizes the Park will consult with the State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act regarding the number of historic structures in the Park, most of which are already known to be Nationally Significant and contribute to the cultural and historic value of the Park's wilderness. EPA recommends the Draft EIS explain how management practices (e.g., vegetation clearing, use of fire, etc.) will impact these resources. Tribal connections to the Park should be considered when developing alternatives and analyzing impacts of proposed management. Lastly, results of coordination with the SHPO, the Grand Portage Band of Lake Superior Chippewa, and the 1 U.S. Global Change Research Program, 2014 National Climate Assessment, available at:

<http://nca2014.globalchange.gov/report>

² <https://www.epa.gov/arc-x>

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Voight Intertribal Taskforce of the Great Lakes Indian Fish and Wildlife Commission should be included in the Draft EIS.

Flora and Fauna

Fauna

The gray wolf is listed as an endangered species under Section 7 of the Endangered Species Act (ESA). The U.S. Fish and Wildlife Service (FWS) 2015 final rules for gray wolves in the Western Great Lake States indicates the Park is designated as critical habitat. While the population may not contribute to federal recovery goals, the Draft EIS should analyze how the alternatives could impact reintroduction efforts.

The northern long-eared bat is listed as a threatened species under the ESA. Since northern long-eared bats occasionally inhabit human structures and roost in trees, any actions involving tree or structure removal or relocation should be evaluated in relation to potential impacts to the species and its habitat. In addition, other Federally-listed species are known to be in the general area encompassing northern Michigan, Wisconsin and Minnesota. We recommend the Draft EIS reflect consultation with the FWS. In addition, we recommend the Park Service coordinate with the Michigan Department of Natural Resources regarding potential impacts to state-listed species.

Flora

Non-native, invasive plant species (NNIS) can spread as a result of management activities and visitor use and result in adverse impacts to the ecosystem as well as the natural qualities of the Park. We recommend the Draft EIS:

- describe how the project will meet the requirements of Executive Order 13112 on invasive species.
- discuss standard best management practices that will be used to reduce the likelihood of spreading NNIS (e.g., washing construction equipment prior to use within the Park, having visitors clean hiking boots, boats, etc. before accessing the Park, etc.).
- discuss whether native species and pollinator-friendly plants will be used to revegetate disturbed areas.

Visitor Access

The Draft EIS should discuss impacts to visitor access for each alternative. For example, will visitor

access to certain trails or campground areas be restricted during summer months or will management of these resources occur during winter months when visitor numbers are low?

Construction and Staging

EPA recommends the Draft EIS include exhibits or aerial photographs indicating the potential location of any temporary access routes or staging areas that would be necessary to revise any structures in the Park. The Draft EIS should also discuss transport of necessary materials. This information is critical to ensure activities comply with the Wilderness Act and do not adversely affect the wilderness qualities of the Park. Best management practices typically employed to minimize construction impacts to air quality, water resources, soil (e.g., sediment and erosion control methods), and other regulated resources should be included in the Draft EIS.

Air Quality

The Draft EIS should discuss potential air quality impacts resulting from potential management activities. Because the Park is largely classified as wilderness, the Draft EIS should discuss how some management activities (e.g., trail relocations, creation of new campgrounds, etc.) would be

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accomplished. If construction equipment will be used in non-wilderness areas, the Draft EIS should consider best management practices to decrease temporary emissions (e.g., diesel emissions and fugitive dust). In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Acute exposures can lead to other health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Longer-term exposure may worsen heart and lung disease. EPA recommends the Park Service consider the protective measures outlined in the enclosed "Construction Emission Control Checklist" and commit to applicable measures.

Additional Information

- The scoping letter requests information EPA may have regarding environmental resources in the project area. We invite the Park Service to access the following databases to obtain environmental information related to the project area:

EnviroMapper3: <https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system>

Envirofacts4: <https://www3.epa.gov/enviro/facts/multisystem.html>

EJSCREEN5: <https://www.epa.gov/ejscreen>

NEPAssist: <https://www.epa.gov/nepa/nepassist>

303(3) Listed Impaired Waters: <https://www.epa.gov/exposure-assessment-models/303d-listed-impaired-waters>

National Ambient Air Quality Standards status: <http://www.epa.state.oh.us/dapc/general/naaqs.aspx>

3 The Watershed Assessment, Tracking & Environmental Results System (WATERS) unites water quality information previously available only from several independent and unconnected databases.

4 Includes enforcement and compliance information.

5 Promising Practices for EJ Methodologies in NEPA Reviews;

[https://www.epa.gov/sites/default/files/2016-](https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf)

[08/documents/nepa_promising_practices_document_2016.pdf](https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf)

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Enclosure 2

U.S. Environmental Protection Agency

Construction Emission Control Checklist

Diesel emissions and fugitive dust from project construction may pose environmental and human health risks and should be minimized. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is

carcinogenic to humans. Acute exposures can lead to other health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Longer term exposure may worsen heart and lung disease.⁶ We recommend the Park Service consider the following protective measures and commit to applicable measures in the Draft EIS.

Mobile and Stationary Source Diesel Controls

Purchase or solicit bids that require the use of vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available. Commit to the best available emissions control technologies for project equipment in order to meet the following standards.

- On-Highway Vehicles: On-highway vehicles should meet, or exceed, the EPA exhaust emissions standards for model year 2010 and newer heavy-duty, on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).⁷
- Non-road Vehicles and Equipment: Non-road vehicles and equipment should meet, or exceed, the EPA Tier 4 exhaust emissions standards for heavy-duty, non-road compression-ignition engines (e.g., construction equipment, non-road trucks, etc.).⁸
- Marine Vessels: Marine vessels hauling materials for infrastructure projects should meet, or exceed, the latest EPA exhaust emissions standards for marine compression-ignition engines (e.g., Tier 4 for Category 1 & 2 vessels, and Tier 3 for Category 3 vessels).⁹
- Low Emission Equipment Exemptions: The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.

Consider requiring the following best practices through the construction contracting or oversight process:

- Establish and enforce a clear anti-idling policy for the construction site.
- Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.
- Use electric starting aids such as block heaters with older vehicles to warm the engine.
- Regularly maintain diesel engines to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance (e.g., blue/black smoke indicates that an engine requires servicing or tuning).
- Where possible, retrofit older-tier or Tier 0 nonroad engines with an exhaust filtration device before it enters the construction site to capture diesel particulate matter.
- Replace the engines of older vehicles and/or equipment with diesel- or alternatively-fueled engines certified to meet newer, more stringent emissions standards (e.g., plug-in hybrid-electric vehicles, battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives,

⁶ Carcinogenicity of diesel-engine and gasoline-engine exhausts and some nitroarenes. *The Lancet*. June 15, 2012

⁷ <http://www.epa.gov/otaq/standards/heavy-duty/hdci-exhaust.htm>

⁸ <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-nonroad-engines-and-vehicles>

⁹ <https://www.epa.gov/emission-standards-reference-guide/all-epa-emission-standards>

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etc.), or with zero emissions electric systems. Retire older vehicles, given the significant contribution of vehicle emissions to the poor air quality conditions. Implement programs to encourage the voluntary removal from use and the marketplace of pre-2010 model year on-highway vehicles (e.g., scrappage rebates) and replace them with newer vehicles that meet or exceed the latest EPA exhaust emissions standards, or with zero emissions electric vehicles and/or equipment.

Fugitive Dust Source Controls

- Stabilize open storage piles and disturbed areas by covering and/or applying water or

chemical/organic dust palliative, where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.

- Install wind fencing and phase grading operations where appropriate and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Occupational Health

- Reduce exposure through work practices and training, such as maintaining filtration devices and training diesel-equipment operators to perform routine inspections.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, reducing the fume concentration to which personnel are exposed.
- Use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.
- Use respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on the type of work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a NIOSH approval number.

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These comments address the 3 focus questions in reverse order.

3. What do you like and dislike about the preliminary alternative concepts, and why?

Alternative A. Everyone who has visited IR in the last few years knows that Alternative A is not tenable - the IR wilderness experience is clearly deteriorating due to overuse and all its effects.

We have visited IR many times over a 25 year period, as both kayakers and backpackers. We recently gave a talk to our local outdoor club about visiting Isle Royale. We had to be honest and tell the audience not to expect their camping experience to be the best thing about their visit. All of our recent visits have featured overfull campgrounds with campsites that were entirely bare dirt, trampled out in a wide area well into the surrounding vegetation, with extremely full and filthy outhouses. Water sources are polluted by bathers and boaters. The camping culture for experienced users is to get up and leave the campground early in the morning, travel quickly, and arrive at the next campground early enough to get a shelter or even a campsite. Our observation was that later arrivals often simply set up camp in a cleared area, not a designated campsite. Users are avoiding the outhouses and leaving human waste and paper near campsites. Finding a quiet place to observe anything like wilderness is difficult. Even on the trail, popular resting or view spots are rarely empty, very trampled, and often contain litter and human waste litter.

The solution seems simple and clear: limit overnight backcountry visitors.

Alternative B seems designed to accommodate greater numbers of visitors. Therefore, Alternative B without an accompanying plan to limit overnight backcountry visitors would not enhance wilderness qualities.

Alternative C: There are things to like and dislike about this alternative.

Eliminate commercial use - yes. Keep group use for non-profit groups only, such as youth groups, special experience groups like veterans groups, etc. These types of users should not have to compete with commercial groups for group sites, and should not have to arrive at a badly overused group site and have an unpleasant experience because of for-profit use.

Permit (reservation) only camping and shelter use - yes. This is clearly needed.

Eliminating trails and campgrounds: No. If there are less places for visitors to go, then solitude and the wilderness experience will be impacted because users would be more concentrated. The park needs more, not less, campgrounds and trails to spread out use. However, reducing the size of current campgrounds and along with reducing allowed numbers of visitors to them would address many current issues. If visitors want to continue to visit a closed area (and they will), they will create volunteer trails instead of following a properly designed and maintained trail, and camp in an area that now has no proper way to manage human waste.

1. What other alternatives, alternative elements, or management tools should be considered?

More camper education, especially about human waste and human waste litter. We do not fault the park service for the outhouse problem. Years ago, visitors contributed to keeping the outhouses clean, and they were.

Please ban hammock use. Hammock users degrade campsites due to trampling out the campsite area to use trees.

On site volunteer or paid campground hosts/educators, especially in the larger and more used campgrounds.

Please increase the number of shelters. We observe that shelter users impact the campground less than tent campers. Shelter use concentrates visitor effects on vegetation and the surrounding area to the immediate vicinity of the shelter, whereas tent users impact a large area due to dispersed use, and, currently, crowding.

2. What issues should be considered when evaluating future stewardship of wilderness at Isle Royale?

The impact of motorized boat use on the park. The coastline and harbors can be very busy places! This impacts wildlife and wilderness.

Thank you for considering these comments.

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I had the opportunity to visit Isle Royale National Park in July 2022. I had been there 1 other time decades ago. I visited the Bangsund Research Station while also visiting the Rock Harbor Lighthouse and Edisen Fishery. I found each of them interesting and educational. That they are in close proximity to each other seems to me to be an advantage as the ecological footprint is in one area instead of separate areas on the islands. I know that Park Administrative Headquarters is necessary to have to run the park and I as I paddled by in my kayak I found it much more intrusive than the research station. I would strongly encourage the Park Service to seek alternatives to fossil fuel generators as from what I could tell the sole power source for Mott Island and Rock Harbor. Likely generator backup but alternative clean energy needs to be addressed. The noise from float planes and generators running were the most intrusive to my wilderness experience, (there was also Coast Guard helicopter maneuvers which I assume was a one off type thing). I was fortunate to have spent part of my trip that are less heavily used, we started at McCargoe Cove and kayaked around to Rock Harbor.

Regarding the Bangsund Research Station, I feel that providing space for research is a valuable use of public land and resources. Evaluating how to minimize the impact to the environment would be useful to do.

I find it curious that the options you list for potential changes seem all one way or another, i.e. increase access or increase restrictions. I think that some blend may be the most appropriate option. Some areas may be best left as is, some areas could maybe tolerate increased usage while others may require more restrictions.

Thank you for the opportunity for public comment.

PEPC Project ID: 109183, DocumentID: 120003

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I personally can't see the benefits of plan c, unless your plan is to stop most visitors from enjoying the park.

Either plan A or B seem the best. While I would love Plan B, with more campsites in campgrounds, additional trails to expand the places one could hike without bushwacking.

This of course, is my opinion, but I have personally visited many, many times starting in 1983.

Although, some like myself may not have issues with camping in conditions described in plan C; I believe you would unfairly restrict first time visitors. Some seem to forget all of us ,no matter how many times we have been, had our first visit too.

Isle Royale National Park is a jewel, in my humble opinion, it is the best National Park. Based on actual visitor numbers posted since recording started, the numbers rise and fall. Recently is not much different from a decade ago. For the people who complain about fellow citizens visiting act as though it should be completely a solitary experience. To those individuals, I say visit some of the other parks in the National Park Service. In realistic terms 28,000 visitors over a basically 4.5 month season spread out over the island is not much. Especially, since a large portion of visitors don't venture much farther than Rock Harbor or Windigo. Does that make their visit less important than someone like me that will hike 200+ miles a season? No it does not.

I am aware that this plan or even parts of this plan may or may not be implemented, but this is my thoughts on this issue.

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Plan B provides for reasonable development and preservation in a manner that promotes safety of visitors. It alleviates many stresses on the overcrowding in campgrounds and safely enhances the experience of solitude.

Plan C does not promote solitude. It strips back the few amenities to none, leaving park visitors vulnerable in every instance. Ensuring that a few people can sit by themselves prevents a reasonable number from having any access at all. I think Plan C is detrimental to use of the island and really to the safety of the few who will use it, given the levels of ignorance many current users display concerning needs in the backcountry.

Winter park use has nothing to do with solitude and does not belong in Plan C. This aspect of the proposal needs separate consideration. Staffing for winter periods is obviously an issue. It's hard enough to staff the park in the current season.

Plan A prevents the address of any known issues. It is not the best plan.