

Apostle Islands National Lakeshore

Wisconsin

Draft Wilderness Study / Environmental Impact Statement

National Park Service
U.S. Department of the Interior



HOW TO COMMENT ON THIS STUDY

Comments on this wilderness study are welcome and will be accepted for 90 days after the Environmental Protection Agency's notice of availability appears in the *Federal Register*. (For the exact date when the public comment period closes, check the park's website, www.nps.gov/apis/wstudy/htm.) If you wish to respond to the material in this document, you may submit your comments by any one of several methods. You may mail written comments to:

Wilderness Study Coordinator
Apostle Islands National Lakeshore
Route 1, Box 4
Bayfield, WI 54814

You may also comment electronically (apis_comments@nps.gov). Please submit Internet comments as a text file avoiding the use of special characters or any form of encryption. Please include your name and return address in your Internet message.

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Comments are most useful if they are specific and do the following:

- Identify incomplete or incorrect information
- Describe why a particular alternative would or would not work

- Offer a new idea or complete new alternative that would accomplish the stated goals
- Point out discrepancies between legal mandates and proposals
- Highlight deficiencies in the analysis of environmental consequences

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**DRAFT
WILDERNESS STUDY /
ENVIRONMENTAL IMPACT STATEMENT**

June 2003

APOSTLE ISLANDS

National Lakeshore · Wisconsin

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DRAFT
WILDERNESS STUDY
ENVIRONMENTAL IMPACT STATEMENT
APOSTLE ISLANDS NATIONAL LAKESHORE
Bayfield and Ashland Counties, Wisconsin

This *Draft Wilderness Study / Environmental Impact Statement* describes and analyzes four alternatives for designating wilderness in Apostle Islands National Lakeshore. Based on the findings of this study, a formal wilderness proposal may be submitted to the Director of the National Park Service for approval and subsequent consideration by the Department of the Interior, President, and Congress under the provisions of the Wilderness Act.

Alternative A, the “no-action” alternative, provides a baseline for comparing the other alternatives. Under this alternative, no wilderness would be proposed in the park.

Three alternatives would propose wilderness areas of differing sizes and locations in the park. None of the waters of Lake Superior would be proposed as wilderness under the alternatives. **Alternative B** would propose the highest amount of wilderness (94% of the land base), excluding only the areas determined to be not suitable in all of the alternatives. **Alternative C**, the National Park Service’s **preferred alternative**, would propose that 80% of the park’s land base be permanently protected as wilderness. This alternative is intended to ensure that there will be outstanding opportunities for people to learn both the stories of the people who settled and altered these islands and the story of the subsequent restoration of the park’s “wilderness” qualities. It also strives to minimize the number of small, fragmented areas of wilderness or nonwilderness. **Alternative D** would limit wilderness to remote areas and cover about 55% of the park’s land base. It would include those undeveloped and isolated areas that provide the best opportunities for solitude and primitive recreation during the busy summer season. These areas are not on the current tour boat route, and generally are more distant from the mainland.

This document also discusses the potential consequences of each alternative’s actions on natural resources, cultural resources, wilderness resources, visitor nonwilderness experiences, and park operations. Each alternative has a mix of beneficial and adverse impacts. The main benefits of alternative A are that it would provide maximum flexibility to park managers to expand recreational and interpretive facilities into new areas and to carry out park programs and operations, and that it would allow the greatest number of the park’s cultural resources to be protected in the largest variety of ways. Alternatives B, C, and D would better protect the park’s natural and wilderness resources in the long term than alternative A (largely in proportion to the amount of wilderness recommended in each) and would also provide indirect protection to many of the park’s cultural resources by limiting the spread of development on the islands. The main drawbacks of alternative A are that it would provide the least amount of protection against potential new development-related impacts to natural, cultural, and wilderness resources, and it would provide the least amount of certainty that the park would continue to look and feel as it does today. Alternatives B, C, and D would offer reduced levels of flexibility to park managers to expand the level of development in the areas recommended for wilderness, which may put development pressure on the areas excluded from the proposals. These alternatives would also reduce, but do not eliminate, the treatment options available for cultural resources contained within the areas recommended for wilderness. The National Park Service believes that Alternative C would provide the best mix of beneficial impacts, while minimizing many of the adverse ones.

For questions about this document, contact the park wilderness study coordinator, Jim Nepstad, Apostle Islands National Lakeshore, Route 1, Box 4, Bayfield, WI 54814, write an e-mail message at apis_comments@nps.gov, or call 715-779-3398, extension 102.

A GUIDE TO THIS DOCUMENT

This document contains the *Draft Wilderness Study*, which is intended to determine if and where lands and waters within the Apostle Islands National Lakeshore should be proposed for wilderness designation.

DRAFT WILDERNESS STUDY / ENVIRONMENTAL IMPACT STATEMENT

This *Draft Wilderness Study / Environmental Impact Statement* is organized in accordance with the Council on Environmental Quality's implementing regulations for the National Environmental Policy Act and the National Park Service's Director's Orders on "Park Planning" (DO-2) and "Environmental Analysis" (DO-12).

Chapter 1: Purpose of and Need for the Wilderness Study sets the framework for the entire document. It describes why the study is being prepared and what needs it must address. It gives guidance for the alternatives that are being considered, which are based on the Wilderness Act, 1989 *General Management Plan*, and NPS management policies.

The chapter also provides background on the wilderness study and details the issues and concerns that were raised during public scoping meetings. This chapter concludes with a statement of the scope of the environmental impact analysis; specifically what impact topics were or were not analyzed in detail.

Chapter 2: Wilderness Alternatives, begins by describing what areas were considered not suitable for wilderness designation. It then describes a no-wilderness alternative (alternative A, the no-action alternative).

Alternatives B, C (the agency's preferred alternative), and D are then presented, which propose varying areas for wilderness designation. Next, there is a discussion of which alternative was determined to be the environmentally preferred alternative and a description of alternatives considered but dismissed. The chapter concludes with summary tables of the alternatives and the environmental consequences of implementing those alternative actions.

Chapter 3: Affected Environment describes those areas and resources that would be affected by implementing the various alternatives – natural resources, cultural resources, wilderness resources (including the visitor wilderness experiences), visitor experiences in the nonwilderness areas, and park operations.

Chapter 4: Environmental Consequences analyzes the impacts of implementing the alternatives on the topics described in the "Affected Environment" chapter. Methods that were used for assessing the impacts in terms of the intensity, type, and duration of impacts are outlined at the beginning of the chapter.

Chapter 5: Consultation and Coordination describes the history of public and agency coordination during the wilderness study effort and lists agencies and organizations who will be receiving copies of this document.

The **Appendixes** present supporting information for the document, along with selected references, a glossary, a list of the study authors, and an index.

SUMMARY

The purpose of this wilderness study is to determine if and where lands and waters within the Apostle Islands National Lakeshore should be proposed for wilderness designation. The study identifies a range of possible wilderness configurations within the park and evaluates their effects. Based on the findings of this study, a formal wilderness proposal may be submitted to the Director of the National Park Service for approval and subsequent consideration by the Department of the Interior, President, and Congress under the provisions of the Wilderness Act.

The *National Park Service (NPS) Management Policies 2001* (§6.2.1, NPS 2000) require that all lands administered by the National Park Service be evaluated for their suitability for inclusion within the national wilderness preservation system. When the state of Wisconsin donated lands in the Apostle Islands to the National Park Service, it requested that the wilderness qualities of these lands be protected. The 1989 *General Management Plan* for Apostle Islands National Lakeshore directed that a formal wilderness study be done for the lands and waters within the park to determine if areas should be proposed to Congress for wilderness designation. The plan stated that about 97% (41,054 acres) of the park's land base may be suitable for wilderness and instructed that these lands "...be managed to preserve their potential wilderness values until a formal wilderness study has been completed and forwarded to Congress." For the past 14 years the National Park Service has managed these lands to preserve their wilderness values pending completion of a wilderness study.

In the 2001 Department of Interior appropriations bill, Congress specifically directed that the National Park Service conduct a wilderness study for the Apostle Islands National Lakeshore.

WILDERNESS STUDY PROCESS

In the summer and fall of 2001 the National Park Service began to seek public input on wilderness designation for the Apostle Islands. The public raised several major issues and concerns regarding designating or not designating wilderness during the scoping period, including:

- impacts of potential new developments on the islands
- changes in access to the park
- changes in visitor uses and experiences
- impacts to local communities and the economy
- impacts on Native American treaty rights
- protection of cultural resources
- changes in park operations

Once the issues were understood, the study team began to identify draft alternatives for designating wilderness in the park. In preparing these alternatives, the study team first identified those areas in the park that clearly do not meet the Wilderness Act suitability criteria (see the "Planning Background: Wilderness and the Apostle Islands" section for a list of the suitability criteria). Eight areas or types of areas were found to be clearly not suitable as wilderness and therefore were not considered in any of the wilderness study alternatives:

- waters and submerged lands of Lake Superior up to the ordinary high-water mark
- public docks on the islands
- the mainland unit
- light stations and adjoining cultural landscapes
- housing/administration areas on Stockton, Rocky, Sand, and Oak Islands
- Manitou Island fish camp
- Southeast tip of Sand Island
- West Bay Club on Sand Island

The study team initially identified six draft alternative proposals for designating wilderness in the park. A series of open houses and meetings were then held with the public and interested organizations in July 2002 to gather public input on the alternatives and determine which alternative was favored. After analyzing this public input, the study team revised the alternatives, and dropped two of the preliminary alternatives. The four remaining alternatives (which have been renamed) and their environmental impacts are presented in this draft document. A preferred alternative was selected among these alternatives using a “Choosing By Advantages” (CBA) process.

ALTERNATIVES

Alternative A (No Wilderness)

This alternative, the “no action alternative,” is required under the National Environmental Policy Act. It provides a baseline for comparing the changes and impacts of the other alternatives. Under this alternative no wilderness would be proposed for Apostle Islands National Lakeshore. If this alternative were selected, it is assumed that Congress would approve the no

wilderness recommendation. As a result, the National Park Service would no longer be required to manage the park to protect the area’s wilderness values. However, for at least the short term the National Park Service would continue to protect and maintain the park’s wilderness characteristics indirectly through the existing zoning framework in the 1989 *General Management Plan*. In the long term it is possible that alternative A could be a departure from how the National Park Service has managed Apostle Islands National Lakeshore in the past – when the existing general management plan is revised or a new general management plan is adopted, the management directions for the park could change, which may result in less protection for wilderness resources in parts of the park.

Alternative B (Maximize Wilderness)

Alternative B only excludes the areas determined to be not suitable in all of the alternatives. Of all the alternatives, alternative B would be most similar to how Apostle Islands National Lakeshore is currently being managed because 97% of the park’s land base is being managed as *de facto* wilderness. Altogether, approximately 39,500 acres of the park’s 42,160-acre land base (94%) would be proposed as wilderness under alternative B (see the Alternative B map on page 31). This is the equivalent of 57% of the entire park (69,372 acres), if one considers the waters as well as the lands within the park boundary.

Alternative C (Preferred Alternative and Environmentally Preferred Alternative)

Alternative C is the National Park Service’s preferred alternative for designating wilderness in Apostle Islands National Lakeshore. This alternative is intended to

permanently protect most of the park's natural, cultural, and wilderness resources. It also is intended to ensure that there will be outstanding opportunities for people to learn both the stories of the people who settled and altered these islands and the story of the subsequent restoration of the park's "wilderness" qualities. Basswood, Sand and Long Islands would not be included in this wilderness proposal. Alternative C also would also strive to minimize the number of small, fragmented areas of wilderness or nonwilderness.

Altogether, approximately 33,500 acres of the park's 42,160-acre land base (80%) would be proposed as wilderness under alternative C (see Alternative C map on page 35). This is the equivalent of 48% of the entire park (69,372 acres), if one considers the waters as well as the lands within the park boundary.

Alternative D (Limit Wilderness to Remote Areas)

Alternative D emphasizes those remote, isolated areas that provide the best opportunities for solitude and primitive recreation during the busy summer season. These areas are not on the current tour boat route, and generally are more distant from the mainland. Altogether, approximately 23,000 acres of the park's 42,160-acre land base (55%) would be proposed as wilderness under alternative D (see Alternative D map on page 39). This is the equivalent of 33% of the entire park (69,372 acres), if one considers the waters as well as the lands within the park boundary.

ENVIRONMENTAL CONSEQUENCES

The study team evaluated the potential consequences the different wilderness proposal alternatives would have on natural resources, cultural resources, wilderness resources, visitor nonwilderness experiences, and park operations. In order to analyze the impacts of wilderness designation it was assumed that Congress would approve the no wilderness recommendation. It was further assumed that if wilderness was not designated in the park, administrative or visitor developments could be built in the undeveloped parts of the islands, provided they were consistent with the park's general management plan. It was also assumed that the current general management plan could be modified to allow new development in areas outside the current development zones. The beneficial or adverse effects of wilderness designation were categorized as either short or long term, and their intensity was rated as negligible, minor, moderate, or major. The impacts of the alternatives are summarized in table 3. No cumulative impacts were identified in any of the alternatives. None of the impacts in the alternatives were found to be of sufficient intensity to constitute an impairment of park resources and values. No impacts were identified due to wilderness designation that would require mitigation measures.

Natural Resources

Alternative A would have the least certainty that the park's natural resources would continue to be protected and maintained as they have been. Depending on the level and type of future developments that occur, there would be the potential for moderate, adverse, long-term impacts to soils, plants, and coastal

processes, and negligible to minor, long-term, adverse impacts to wildlife.

Wilderness designation in alternatives B, C, and D would provide an additional layer of protection and ensure that natural resources would be permanently protected. Alternatives B and C would have moderate, long-term, beneficial impacts in the wilderness area, while alternative D would have minor to moderate, long-term, beneficial impacts. In the nonwilderness areas alternative B would have negligible to moderate, short and long-term impacts on natural resources in localized areas, depending on the new developments that occurred.

Alternative

C would have the same type of impacts as alternative B, but more natural resources could be adversely affected in more areas, depending on the level of development that occurred. Likewise, alternative D would have the same type of impacts as alternative B, but more natural resources could be adversely affected in more areas than in alternatives B and C.

Cultural Resources

Alternative A would provide maximum flexibility in managing and preserving cultural resources, including flexibility in locating new developments to avoid cultural resource impacts. But alternative A also has the highest potential of all the alternatives for adverse, long-term impacts associated with increased visitation in more areas. Depending on the level of development that occurred, alternative A might have the potential for minor to moderate, long-term, adverse impacts to cultural resources throughout the park. However, it appears probable that alternative A would have little or no net impact on cultural resources.

Alternatives B, C, and D have the potential for a mix of beneficial and adverse impacts relative to cultural resources. Some minor, adverse, long-term impacts could occur in the wilderness area in each of the alternatives due to reduced flexibility in the treatment options that would likely be used to manage and protect some cultural resources. Moderate, long-term, adverse impacts could occur to cultural resources in the non-wilderness areas under alternative B, and minor to moderate, long-term, adverse impacts in alternatives C and D, if new developments were built near existing developments where there were concentrations of cultural resources.

Wilderness Resources

Because no wilderness is proposed in alternative A, this alternative would provide the least assurance that wilderness resources, such as apparent naturalness and opportunities for solitude, would continue to be protected as they have been. There would be the potential for minor to major, long-term, adverse impacts on wilderness resources, depending on the level of future development that occurred.

Alternatives B and C would have major, long-term, beneficial impacts on wilderness resources, including visitor wilderness experiences, and alternative D would have moderate, long-term, beneficial impacts, due to permanent protection bestowed by wilderness designation. In the nonwilderness areas alternative B would have some negligible, long-term, adverse impacts on wilderness resources due to new developments. In alternative C there could be some loss of wilderness resources, such as solitude and apparent naturalness, due to potential new developments, primarily on Basswood, Sand, and Long Islands, which would be a

minor to moderate, long-term, adverse impact. Under alternative D there could be a loss of wilderness resources due to potential new developments, primarily on 12 islands, which could have a minor to major, long-term, adverse impact.

Visitor Nonwilderness Experiences

Alternative A would have the potential for a minor to moderate, long-term, beneficial impact on those visitor experiences not related to wilderness, primarily due to managers' flexibility to expand recreational and interpretive facilities into new areas. Visitors would have additional opportunities to learn about the park's stories and further understand the area's significance.

Alternative B would have the potential for a moderate, long-term, adverse impact on visitors' nonwilderness experiences, primarily due to limiting the expansion of certain visitor facilities into new areas. Visitors could have fewer new opportunities to gain an understanding of the park and its significance than they would have under alternative A. Removing picnic tables from about a third of the campsites also would adversely affect some visitors' experience.

Alternatives C and D would have both beneficial and adverse impacts on visitors' nonwilderness experiences. Compared to alternative A, alternative C would have the potential for a minor, long-term, adverse impact, primarily due to limits on the possible expansion of certain visitor facilities, such as nonpersonal, interpretive media, into new areas, which would forego potential opportunities for visitors. Removing picnic tables from about 20% of the campsites also would adversely affect some visitors' experience. Alternative D likewise would have the potential for a

negligible, long-term, adverse impact for the same reasons. But both alternatives would have the potential for a beneficial, long-term impact by providing visitors with more opportunities onsite to learn the wilderness and nonwilderness stories of the Apostle Islands. Of all the alternatives, alternative C has the most visible "edge" between wilderness and nonwilderness on the islands, which would provide more opportunities for the National Park Service to educate visitors onsite on the role that wilderness plays in shaping the American cultural and physical landscape. This would have a beneficial impact on some visitors' experience.

Park Operations

All of the alternatives would have the potential for both beneficial and adverse impacts to park operations, depending on the level and type of new developments that occur. Alternative A would have the potential for minor to moderate, long-term, beneficial impacts due to a high degree of management flexibility in carrying out park programs and operations. But increased levels of development that could occur under this alternative also could have minor to major, long-term, adverse impacts on the park's operations, primarily due to increased costs and increased demands on park staff's time and energy, assuming staffing levels did not change.

Compared to alternative A, alternative B could have a minor to moderate, long-term, beneficial impact on park operations, due to new developments mostly being confined to a few areas, which would result in lower operational costs. Alternative B also would have minor to moderate, long-term, adverse impacts due to decreased management flexibility and possible increased costs in managing the

few facilities that are in the wilderness area.

Alternatives C and D would have similar effects but in varying intensities due to the changes in the size of the areas being proposed for wilderness. Compared to alternative A, alternative C would have the potential for minor to moderate, long-term, beneficial impacts, and alternative D

would have the potential for minor, long-term, beneficial impacts, because there would be fewer areas where new developments would occur. Both alternatives C and D also would have minor, long-term, adverse impacts due to a reduction in management flexibility and possible increased costs of management in the wilderness area.

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Purpose and Need for the Wilderness Study



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PURPOSE OF AND NEED FOR THE ACTION

PURPOSE OF THE WILDERNESS STUDY

The purpose of this wilderness study is to determine if and where lands and waters within the Apostle Islands National Lakeshore (also referred to as the park in this document) should be proposed for wilderness designation. The study identifies a range of possible wilderness configurations within the park and evaluates their effects on the human environment. Based on the findings of this study, a formal wilderness proposal may be submitted to the Director of the National Park Service for approval and subsequent consideration by the Department of the Interior, President, and Congress under the provisions of the Wilderness Act.

It is important to note that the purpose of this study is *not* to examine questions regarding how a wilderness area should be administered. These questions would be addressed in a subsequent wilderness management plan, which will be prepared if Congress passes legislation designating any portion of the park as wilderness. (For more details on wilderness management, see the *NPS Management Policies 2001*, which are available on-line at www.nps.gov/apis/wstudy.htm.) Some questions that a wilderness plan will need to address are listed in the text box on the following page.

NEED FOR THE WILDERNESS STUDY

The Wilderness Act and *National Park Service Management Policies 2001* (§6.2.1,

NPS 2000) require that all lands administered by the National Park Service be evaluated for their suitability for inclusion within the national wilderness preservation system. Section 6.2.2 further states that “lands and waters found to possess the characteristics and values of wilderness, as defined in the Wilderness Act and determined suitable pursuant to the wilderness suitability assessment, will be formally studied to develop the recommendation to Congress for wilderness designation.”

The 1989 *General Management Plan* (see the Glossary at the back of the document for a list of terms) for Apostle Islands National Lakeshore directed that a formal wilderness study be done for the lands and waters within the park to determine if areas should be proposed to Congress for wilderness designation. The plan stated that about 97% (41,054 acres) of the park’s land base may be suitable for wilderness and instructed that these lands “...be managed to preserve their potential wilderness values until a formal wilderness study has been completed and forwarded to Congress.” For the past 14 years the National Park Service has managed these lands to preserve their wilderness values pending completion of a wilderness study.

In the 2001 Department of Interior appropriations bill, Congress specifically directed the National Park Service to conduct a wilderness study for the Apostle Islands National Lakeshore.

WHAT IS WILDERNESS?

As defined in the Wilderness Act, wilderness is “...an area of undeveloped Federal land...without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected *primarily* by the forces of nature, with the imprint of man’s work *substantially* unnoticeable; (2) has outstanding opportunities for solitude *or* a primitive and unconfined type of recreation; (3) has at least 5,000 acres of land *or* is of sufficient size as to make practicable its preservation and use in an unimpaired condition....”
{Emphasis added}

It is important to note that wilderness does *not* have to be pristine or greater than 5,000 acres in size – smaller areas and those that have been previously altered by people can qualify for wilderness designation.

“Potential wilderness” also is a term that the National Park Service uses. As defined in *NPS Management Policies* (§6.2.2.1), potential wilderness is an area that is surrounded by or adjacent to lands proposed for wilderness designation but does not qualify for immediate designation due to temporary, nonconforming or incompatible conditions. If so authorized by Congress, potential wilderness areas become designated wilderness upon the Secretary of the Interior’s determination that the nonconforming use has been removed or eliminated. Areas that may be potential wilderness include areas with use and occupancy cabins and areas where there are rights owned by entities other than the federal government.

USES AND MANAGEMENT IN WILDERNESS

Although this study is not examining use or management of wilderness, the Wilderness Act and NPS policies permit and prohibit various uses, developments, and actions. These directions need to be considered in evaluating impacts of the wilderness proposals.

A variety of recreational uses, management actions, and even facilities are permitted in wilderness areas under the Wilderness Act and NPS policies. Among the uses, management actions, and facilities *permitted in wilderness* are:

- nonmotorized recreational uses (e.g., hiking, backpacking, picnicking, camping)
- hunting and trapping (where otherwise permitted by law, as in the Apostle Islands National Lakeshore) and fishing
- Native American religious activities and other actions recognized under treaty-reserved rights
- guided interpretive walks and onsite talks and presentations
- use of wheelchairs, service animals, and reasonable accommodations for the disabled that are not in conflict with the Wilderness Act (e.g., barrier-free trails, accessible campsites)
- scientific activities/research
- monitoring programs
- management actions taken to correct past mistakes or impacts of human use, including restoration of extirpated species, controlling invasive alien species, endangered species management, and protection of air and water quality
- fire management activities (including fire suppression)
- protection and maintenance of historic properties eligible for the National Register of Historic Places
- trails
- campsites
- certain administrative facilities if necessary to carry out wilderness management objectives (e.g., storage or support structures, ranger station)
- signs necessary for visitor safety or to protect wilderness resources
- uses and facilities permitted for landowners with valid property rights in a wilderness area

The Wilderness Act also specifically *prohibits* certain uses and developments. Under section 4(d) of the Act, the following uses are not permitted in a wilderness:

- permanent improvements or human habitation
- structures or installations
- permanent roads
- temporary roads
- use of motor vehicles
- use of motorized equipment
- landing of aircraft (except for emergency purposes)
- other forms of mechanical transport (e.g., bicycles)
- commercial enterprises (except for commercial services that are necessary for realizing the recreational or other wilderness purposes of the area, such as guiding and outfitting)

With the exception of permanent roads, the Act does recognize that the above uses *may be permitted* if necessary to meet the minimum requirements for the administration of the area as wilderness or for emergency purposes.

In addition to the above prohibitions, NPS policies also *prohibit* some developments:

- new utility lines
- permanent equipment caches
- site markings or improvements for nonemergency use
- borrow pits (except for small quantity use of borrow material for trails)
- new shelters for public use
- picnic tables
- interpretive signs and trails and waysides (unless necessary for visitor safety or to protect wilderness resources)

Ninety-seven percent of the land base of Apostle Islands National Lakeshore is currently being managed according to the above NPS policies and directions.

BACKGROUND FOR THE WILDERNESS STUDY

BRIEF DESCRIPTION OF APOSTLE ISLANDS NATIONAL LAKESHORE

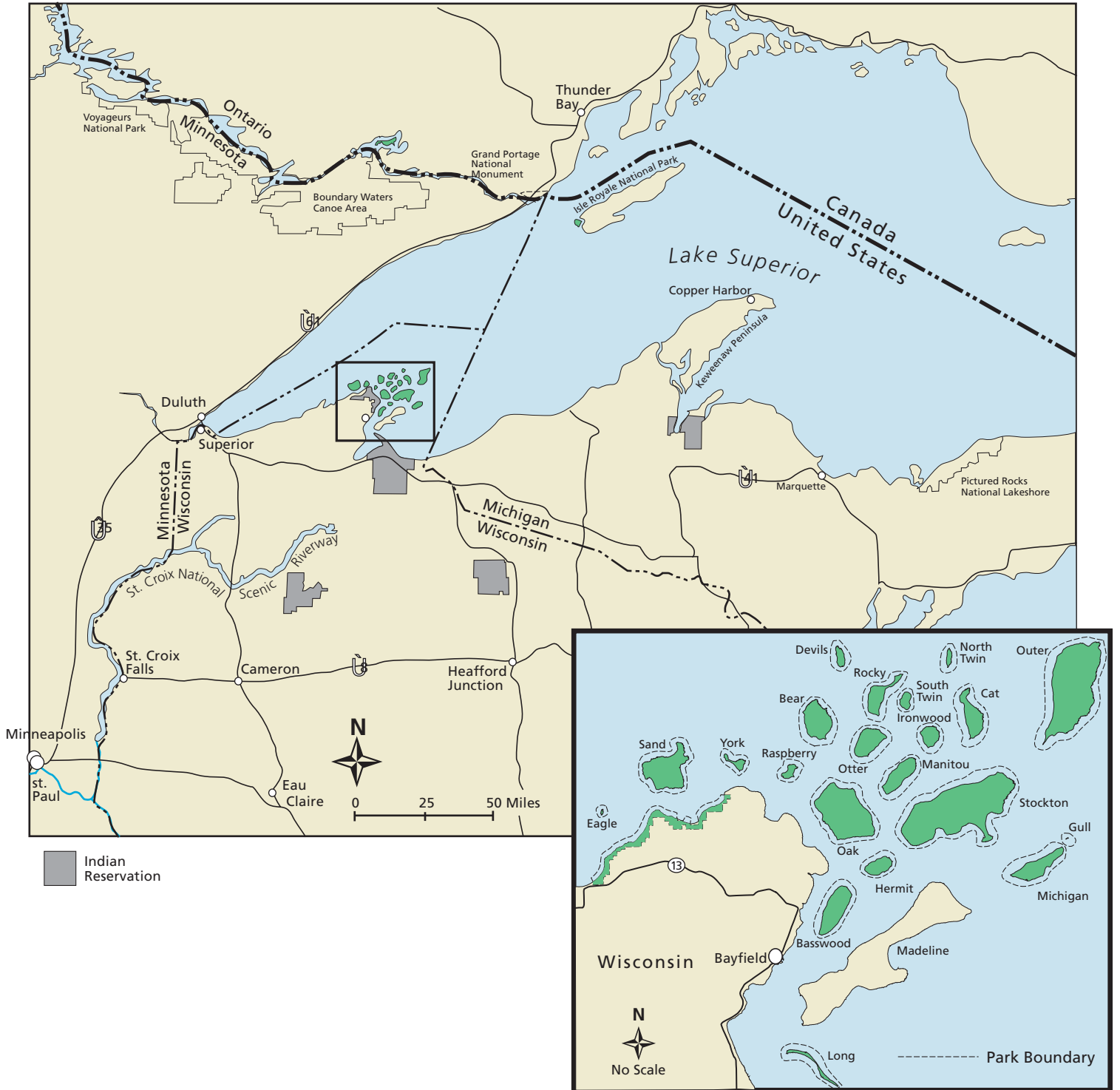
Apostle Islands National Lakeshore, on the tip of the Bayfield Peninsula in northern Wisconsin, includes 21 islands in Lake Superior and a 12-mile narrow strip of mainland shoreline (see figure 1). Established by an act of Congress on September 26, 1970, the purpose of the park is “to conserve and develop for the benefit, inspiration, education, recreational use, and enjoyment of the public” the islands and their related geographic, scenic and scientific values. Apostle Islands National Lakeshore encompasses 69,372 acres, of which 27,323 acres are submerged lands in Lake Superior; the park boundary extends a quarter mile from the shore of the mainland and from each island. The islands range in size from 3-acre Gull Island to 10,054-acre Stockton Island. A variety of scenic features can be found on the islands, including examples of some of the earliest and latest events of geologic history in the lower 48 states. The park features pristine stretches of sand beaches and coves, spectacular sea caves, remnant old growth forests, a diverse population of birds, mammals, amphibians, and fish, and the largest collection of lighthouses in the national park system. People have used the islands for thousands of years. During the historic period, people constructed residences and started farms, fishing operations, brownstone quarries, and logging camps on the islands. Several of these historic sites are listed on the National Register of Historic Places.

PLANNING BACKGROUND: WILDERNESS AND THE APOSTLE ISLANDS

Throughout the planning efforts that led to the establishment of Apostle Islands National Lakeshore, the importance of protecting the wilderness qualities of the islands was recognized. The 1965 Department of Interior proposal for the park stated that the islands “...should be considered as primitive and wild areas and as such only minimum basic facilities are necessary for their use and enjoyment.” Assistant Secretary of the Interior Leslie Glasgow stated in testimony at a March 1970 Senate hearing that “The majority of the islands are...ideally suited for wilderness camping, hiking, and natural science studies....” Jordahl (1994) noted that in establishing the park Congress clearly intended that, with the exception of Sand Island, the islands be kept wild and primitive.

The state of Wisconsin also directed that wilderness qualities be protected in the park. One of the conditions the Wisconsin legislature stipulated when it donated its lands to the federal government for the park was that this area’s wilderness character be preserved. The legislature stated: “It is the policy of the legislature that the Apostle Islands be managed in a manner that will preserve their unique primitive and wilderness character” (Wisconsin Statutes §1.026(1)(b)).

As noted above, the 1989 *General Management Plan, Apostle Islands National Lakeshore*, called for a formal wilderness study for Apostle Islands National Lakeshore. The *General Management Plan* found approximately 97% of the lands



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Location Apostle Islands National Lakeshore

U.S. Department of the Interior
National Park Service



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in the park under NPS jurisdiction (about 41,054 acres) may be suitable for wilderness. These lands and waters were placed in the natural zone in the *General Management Plan* and have been managed to preserve their potential wilderness values pending completion of a formal wilderness study.

National Park Service Management Policies 2001 direct that a wilderness suitability assessment be prepared that identifies all areas within the park that potentially qualify as being suitable for wilderness designation. The accompanying text box describes the criteria that are used to determine if areas are suitable for wilderness. On April 27, 2001, the NPS Director concurred that the park's 1989 *General Management Plan* met the requirements for a wilderness suitability assessment (see appendix A).

WILDERNESS SUITABILITY ASSESSMENT AND STUDY POLICIES AND GUIDELINES

The Wilderness Act (PL 88-577) and *National Park Service Management Policies 2001* (NPS 2000) provide directions and guidelines for wilderness suitability assessments, which also apply to wilderness studies. These policies and guidelines delineate existing and future conditions and uses that are compatible with wilderness designation. Congress also implied in the Eastern Wilderness Act (PL 93-622) that wilderness does not have to consist solely of pristine old-growth forest and that lands previously disturbed can be rehabilitated to meet wilderness standards and qualities.

The following directions are particularly relevant to the Apostle Islands National Lakeshore wilderness study:

- *Past Uses* – Lands that have been logged, farmed, grazed, mined, or otherwise utilized in ways not involving extensive development or alteration of the landscape may also be considered for wilderness designation if the effects of these activities are substantially unnoticeable or their wilderness character could be maintained or restored through appropriate management actions.
- *Management* – An area will not be excluded from a determination of wilderness suitability solely because established management practices require the use of tools, equipment or structures, if those practices are necessary to meet minimum requirements for the administration of the area as wilderness.
- *Historic Features* – Historic features that are primary visitor attractions (e.g., light stations) will not be recommended for wilderness designation by Congress. However, an area that attracts visitors primarily for the enjoyment of solitude and unconfined recreation in a primitive setting and that may also contain historic features may be recommended for wilderness. Typical historic features that may be included are archeological sites, historic trails, travel routes, and minor structures.
- *Existing Developments* – Areas where evidence of people and their developments are obvious and are expected to remain are not suitable for wilderness designation. NPS development zones, as identified in the *General Management Plan*, *Apostle Islands National Lakeshore*, are not compatible with wilderness designation.

WILDERNESS SUITABILITY CRITERIA

Under *National Park Service Management Policies 2001*, NPS lands will be considered suitable for wilderness if they are at least 5,000 acres or a sufficient size to make practicable their preservation and use in an unimpaired condition, and if they possess the following characteristics as identified in the Wilderness Act:

- The earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain.
- The area is undeveloped federal land retaining its primeval character and influence, without permanent improvements or human habitation.
- The area generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable.
- The area is protected and managed so as to preserve its natural conditions.
- The area has outstanding opportunities for solitude or a primitive and unconfined type of recreation.

Some have questioned whether the Apostle Islands meets the criteria for wilderness designation. It is true that the Apostle Islands are not a pristine landscape. Logging, quarrying, and farming have altered the landscape of many of the islands. However, in the Eastern Wilderness Act, Congress recognized that smaller natural areas can still be considered for wilderness designation even if they are not "pristine." The key questions that need to be answered are: 1) Will the area recover significantly to a natural state (not necessarily to its original state)? 2) Can the area be reasonably protected in the future as wilderness? In the case of the Apostle Islands National Lakeshore, the National Park Service determined in the 1989 *General Management Plan* that most of the park's land base was recovering and could be reasonably protected as wilderness.

WILDERNESS STUDY PROCESS

In the summer and fall of 2001 the National Park Service began to seek public input on wilderness designation for the Apostle Islands. A public open house was held in Bayfield and meetings were held with agencies, tribes, and organizations. However, the formal public scoping process for the wilderness study, required for an environmental impact statement under the National Environmental Policy Act, began on October 12, 2001, when a notice of intent to prepare the wilderness study/environmental impact statement was published in the *Federal Register*. Letters were sent out at that time to the park's mailing list, requesting the public to identify the major issues and concerns regarding the wilderness study. The mailing list that the park staff routinely uses to invite public input on its plans and

studies was used as the starting point for the wilderness study mailing list. This list was supplemented with individuals and organizations who expressed interest in the study after it was publicized. Once the issues were understood, the study team identified six draft alternative proposals for designating wilderness in the park. A series of open houses and meetings were then held with the public and interested organizations during the summer of 2002 to gauge public reaction to the alternatives and determine which draft alternative was favored (see the "Consultation and Coordination" chapter for a list of these meetings). After analyzing this public input, the study team revised the alternatives, and dropped two of the preliminary alternatives. The four remaining alternatives (which have been renamed) and their environmental impacts

TREATY AND PROPERTY RIGHTS PERTINENT TO THE WILDERNESS STUDY

Certain treaty and property rights apply to all the alternatives being considered in the wilderness study:

- **Treaty Rights:** Native American treaty rights will continue to be honored under all of the alternatives being considered in the study – none of the alternatives being considered would impede, prevent, or in any way negate treaty rights. Wilderness will not, indeed cannot, affect the gathering or harvesting of plants or plant materials, hunting, fishing, and trapping rights, or commercial fishing (although with appropriate consultation it may affect the manner in which these treaty rights are exercised). These rights are "reserved rights" through the treaties of 1837, 1842, and 1854, which were reaffirmed through *State vs. Gurnoe* and *Lac Courte Oreilles Band of Chippewa Indians vs. Voigt*. In addition, the Red Cliff and Bad River Bands of Chippewa Indians have reserved rights beyond or in addition to those guaranteed by the Treaty of 1842 for those portions of the park that lie within their reservations.
- **Other Valid Rights:** Wilderness will not affect the owners of various valid property rights under all of the alternatives being considered in the study. This includes county and township owned lands, mineral right owners, and individuals with use and occupancy rights. The National Park Service will continue to honor and respect the valid rights of these entities and individuals under all of the alternatives, as required under the provisions of the Wilderness Act and NPS management policies.

are presented in this draft document. A preferred alternative was selected among these alternatives using a “Choosing By Advantages” (CBA) process (Suhr 1999). This process, which has been used extensively by government agencies and the private sector, evaluates different choices (in this case, the four draft alternatives) by identifying and comparing the relative advantages of each according to a set of factors. The factors used to evaluate the alternatives were

- ability to ensure long-term preservation of natural and cultural resources
- consistency with the spirit and intent of the Wilderness Act, Eastern Wilderness Act, other relevant legislation, NPS policy and the Wisconsin Legislature’s policy in donating its lands to the federal government
- ability to preserve and tell the stories of the Apostle Islands
- consistency with public comments received on the preliminary alternatives

This *Draft Wilderness Study / Environmental Impact Statement* will have a 90-day public review comment period. During this period, the National Park Service also will hold public meetings, including at least one public hearing, to provide additional opportunities for the public to provide comments on the draft. After the comment period ends, the study team will review comments on the draft document, make appropriate revisions to address the comments, and prepare a final wilderness study / environmental impact statement. The final document will include responses

to substantive written and oral comments on the draft document — comments that modify the preferred alternative, the range of alternatives, or the environmental analysis. A minimum of 30 days after the final study / environmental impact statement is published, a record of decision will be signed by the NPS Midwest Regional Director and published in the *Federal Register*. This record of decision will document what action the National Park Service intends to take regarding a wilderness proposal for the Apostle Islands National Lakeshore.

If the decision is made to propose wilderness, and the NPS Director concurs, a wilderness proposal will be sent to the Assistant Secretary of Fish and Wildlife and Parks and the Secretary of the Interior, who may revise or approve the proposal. The Secretary may then forward a wilderness recommendation to the President. The President may approve or revise the recommendation and then transmit his recommendation to Congress for consideration. Congress may enact legislation needed to include the area within the national wilderness preservation system as “designated” and/or “potential” wilderness.

It is important to note that under NPS policies the 97% of lands within the park that have been found suitable for wilderness designation will continue to be managed as *de facto* wilderness until Congress takes action on a wilderness recommendation or the Secretary of the Interior recommends to the President that no lands be recommended to Congress for designation as wilderness.

PRIMARY ISSUES AND CONCERNS

Several major issues and concerns regarding designating or not designating wilderness were raised prior to and during the public scoping period by citizens, local governments, state agencies, and tribes. These issues and concerns were expressed at a public open house, held on July 25, 2001, in Bayfield, mailed in via comment forms and the Internet, and voiced at several meetings members of the planning team held with agencies and organizations during the summer of 2001.

It is important to note that the issues and concerns listed below are the *perceptions* of those who commented during the scoping period. They do not necessarily reflect how the National Park Service would actually manage wilderness. For more details on wilderness management, see the *NPS Management Policies 2001*, which are available on-line at www.nps.gov/apis/wstudy.htm.

1. IMPACTS OF POTENTIAL NEW DEVELOPMENTS ON THE ISLANDS

The most frequent concern raised by individuals and conservation groups was the possibility that in the future new developments could be built or other actions taken that would change the character of the park. Many of these people wanted to ensure that the islands be maintained as they are for present and future generations. Concerns were raised that without the protection provided by wilderness, there could be fewer opportunities for those seeking solitude and quiet, primitive recreational experiences, and that adverse impacts could occur to the islands' wildlife and other resources.

2. ACCESS TO APOSTLE ISLANDS NATIONAL LAKESHORE (MOTORBOATS AND SAILBOATS)

Another issue frequently raised by individuals and local governments was access to the park. People were concerned that wilderness would "lock up" the park, preventing or reducing access and use of the islands and preventing motorboat access. Local residents were worried that they would not be able to use the islands. People were apprehensive about wilderness extending out into the ¼-mile water area surrounding the islands. Concerns were expressed that wilderness designation would prevent docks from being used, prevent people from snowmobiling by the islands to ice fish, result in restrictions being placed on anchorages, and prevent people with disabilities from accessing the islands. This issue was considered but was not addressed further for the reasons outlined at the end of this chapter.

3. CHANGES IN VISITOR USES AND EXPERIENCES

Another major concern was how the visitor experience would change as a result of wilderness designation. A fear was expressed that wilderness would result in more and more restrictions being placed on uses of the islands over time, which would alter the experience people now have. Some expressed the opinion that with wilderness, visitors would have less freedom to do what they want, when and where, compared to the present. Other concerns were what effect wilderness would have on hunting and trapping and commercial fishing.

4. IMPACTS TO THE LOCAL COMMUNITIES AND ECONOMY

A fourth major concern was what effect wilderness designation would have on the local communities and their economies. Concerns were expressed that wilderness designation would threaten the tourism industry, which is vital to the area and has shaped itself around the park's current management approach. This issue was considered but was not addressed further for the reasons outlined at the end of this chapter.

5. IMPACTS ON NATIVE AMERICAN TREATY RIGHTS

Representatives of Native American tribes were concerned that wilderness might interfere with their treaty rights, specifically commercial fishing and trapping, hunting, and gathering. A concern was expressed that wilderness could result in a ban on commercial fishing. Another concern was that wilderness might limit motorboat access to the islands and limit the use of motorized vehicles to transport elders to important remote areas. This issue was considered but was not addressed further for the reasons outlined in the textbox in the "Wilderness Study Process" section.

6. PROTECTION OF CULTURAL RESOURCES

Concerns were expressed that wilderness designation would restrict actions that can be taken to maintain and protect cultural resources, such as the quarries and old farmsteads. Some people believe that wilderness designation would increase the temptation to remove and obliterate signs of past human use. Specific details regarding the management of cultural resources in wilderness are beyond the scope of this wilderness study and are more appropriately considered in a subsequent wilderness management plan. However, this concern is generally addressed in the "Environmental Consequences" chapter of this environmental impact statement.

7. PARK OPERATIONS

Concerns were raised that wilderness designation would reduce the flexibility of park managers to use machinery and other motorized equipment to manage resources and visitors in wilderness. This could reduce the productivity of staff, increase the number of staff needed to complete a task, and increase costs.

IMPACT TOPICS CONSIDERED IN THIS ENVIRONMENTAL IMPACT STATEMENT

To focus the environmental impact analysis in this document, and to ensure that the alternatives were evaluated against relevant topics, the study team selected specific impact topics for further analysis and eliminated others from evaluation. The impact topics selected for analysis in this document, listed below, were based on public and other agency concerns identified during scoping, federal laws, regulations and orders, and National Park Service Management Policies 2001 (NPS 2000). A brief rationale for selecting each impact topic is provided below.

NATURAL RESOURCES (GENERAL)

This topic includes geology and coastal processes, soils, water quality, vegetation, and wildlife. None of the alternatives being considered would alter the park's soils, biotic communities, vegetation or wildlife populations, or other natural resources. Wilderness designation would not substantially affect either the management of natural resources, such as vegetation and wildlife in the park, or uses within the park that could affect these resources. In all of the alternatives the National Park Service would continue to protect and conserve native vegetation, wildlife, and other natural resources as required under the NPS Organic Act and *NPS Management Policies 2001*. However, in implementing the alternatives there is the potential that future developments could occur in those areas that are excluded in the various wilderness proposals, which could affect the park's natural resources.

Any loss or alteration of coastal processes, soils, vegetation, wildlife, etc., would be of concern to visitors, the general public, and NPS managers. This impact topic addresses issue #1.

CULTURAL RESOURCES (ARCHEOLOGICAL RESOURCES, HISTORIC STRUCTURES, ETHNOGRAPHIC RESOURCES, AND CULTURAL LANDSCAPES)

Wilderness designation could affect the park's cultural resources, including archeological and ethnographic resources, historic structures, and cultural landscapes. In all of the alternatives the National Park Service would continue to protect and conserve cultural resources as required under the National Historic Preservation Act, Archaeological Resources Protection Act, NPS Organic Act and *National Park Service Management Policies 2001*. But like the natural resources, in the implementation of the alternatives there is the potential that future developments could occur in those areas that are excluded in the various wilderness proposals, which could affect the park's cultural resources. Any loss or alteration of archeological sites, historic structures, cultural landscapes, and ethnographic resources would be of concern to visitors, the general public, and NPS managers. This impact topic addresses issue #6.

WILDERNESS RESOURCES (INCLUDING THE VISITOR WILDERNESS EXPERIENCES)

The primary purpose of this study is to determine whether or not wilderness should be proposed for Apostle Islands National Lakeshore. A wilderness type experience is important to many visitors who come, or want to come, to the park. Director's Order 41 ("Wilderness Preservation and Management") and *National Park Service Management Policies 2001* require that the wilderness qualities found in 97% of the park's land base be protected until Congress takes action on a wilderness recommendation. Thus, the park's wilderness resources are important to consider in the management of the park. During the scoping period many people emphasized the need to protect the park's wilderness resources. Any decreases in opportunities for solitude, the apparent naturalness of the park, and opportunities for primitive, unconfined recreation would be of concern to some visitors, managers, and the public. This impact topic addresses issue #2.

VISITOR NONWILDERNESS EXPERIENCES

This topic relates to the quality of those visitor experiences not related to wilderness, including the range of activities available to visitors. The purpose of Apostle Islands National Lakeshore is "to conserve and develop for the benefit, inspiration, education, recreational use, and enjoyment of the public." Any actions that would diminish the quality of visitors' experiences in the park would be

important to visitors and managers — changes in available visitor opportunities, the character of the visitor experience, or what activities are and are not permitted would be of concern to many people. During the scoping period many people expressed concerns about the impacts of wilderness designation on their experience in the park. This impact topic addresses issue #2.

PARK OPERATIONS

This topic concerns park staffing levels and workloads, maintenance activities, costs, planning needs, and the ability to consider facilities in the future to support island administrative operations. Although much of the park could be designated as wilderness under the alternatives, most island operations would not be affected because major developments would not be included in any of the wilderness proposals. But wilderness designation could increase some workloads and staff needs and decrease other needs. Proposed management actions, such as administrative use of motorized equipment or mechanical transport, would need to be evaluated to determine if they are consistent with NPS wilderness policies before they could be authorized. Any changes in park operations due to wilderness (e.g., changes in maintenance activities, ranger patrols, or costs) may be of concern to both NPS staff and visitors. This impact topic addresses issue #7.

would occur regardless of whether or not wilderness was designated.

MUSEUM OBJECTS

Museum objects are manifestations and records of behavior and ideas that span the breadth of human experience and depth of natural history. None of the proposed alternatives have potential to affect museum objects.

PUBLIC HEALTH AND SAFETY

None of the alternatives would result in identifiable risks to human health and safety. Wilderness designation would not change visitor activities or management activities that would substantially alter the potential for threats to the health and safety of people in the park – regardless of whether or not wilderness would be designated, Lake Superior would pose the same risks for people who paddle, sail, or motor to the islands.

ACCESS TO APOSTLE ISLANDS NATIONAL LAKESHORE

None of the alternatives in this study would affect access to the park by any currently legal means, including motorboats and sailboats — all currently permitted access methods would continue regardless of whether or not wilderness is designated in the park. None of the alternatives would result in the removal of public docks, or prohibit boats from being beached on the islands, which also could affect access to the islands.

SOCIOECONOMIC ENVIRONMENT

Apostle Islands National Lakeshore affects local businesses and the economy of

Bayfield and other communities in the area. Any actions that would alter visitor use levels or visitor use patterns would be of concern to many local businesses, including marinas, lodges, motels and restaurants, supply stores, guides, outfitters, and concessioners. During the scoping period many people expressed concern that wilderness designation would adversely affect the local economy. The two-county economy would be negatively affected only if designating wilderness (and managing these areas as wilderness) would cause negative changes in the numbers of visitors and/or their expenditure patterns, to the extent that individuals or firms would experience a loss of jobs and/or income. Because none of the alternatives would affect existing docks or access to the islands, no changes would be expected in overall visitor use levels or use patterns, and thus no changes would be expected in visitor expenditures related to the park.

Also, NPS policy is to manage parklands and waters that have the potential for wilderness designation in a manner that preserves the wilderness potential and qualities of these resources. The islands being considered for designation as wilderness are currently being, and have been, managed to preserve wilderness values. Consequently, very little change in management activities and allowable types of use would occur in these areas of the park. As a result, official recognition and legal protection of wilderness in the park would not cause negative impacts to the local economy.

There are no studies that support the hypothesis that negative impacts would occur to the local and regional economy as a result of the alternatives – there is a lack of evidence to substantiate claims that designating wilderness actually harms a

