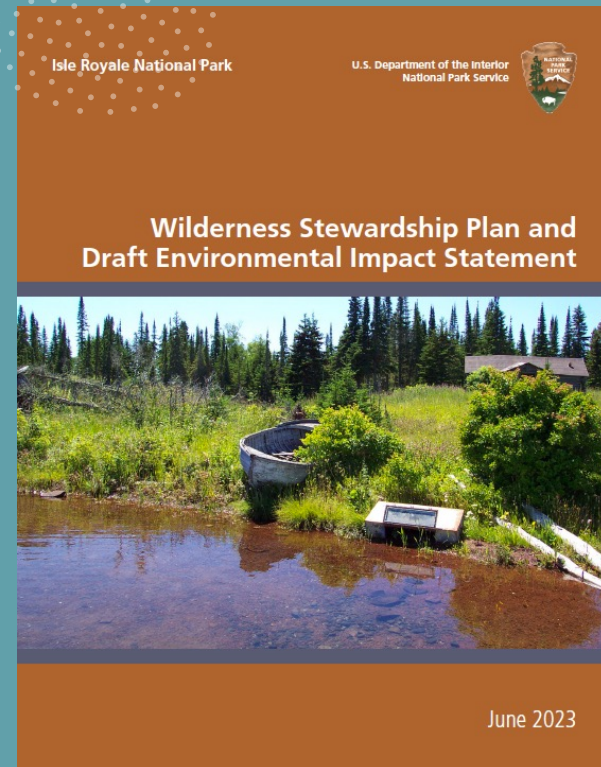


2023 Draft Wilderness Stewardship Plan



Highlights



WILDERNESS DESIGNATION DOES NOT DIMINISH THE NPS'S FUNDAMENTAL RESPONSIBILITY FOR AFFIRMATIVELY MANAGING ITS CULTURAL RESOURCES.



52 STRUCTURES OR INSTALLATIONS WOULD BE PRESERVED, 23 WOULD BE STABILIZED, 18 WOULD BE ALLOWED TO MOLDER, AND 7 WOULD BE REMOVED.



ALLOWS RESTRICTED OCCASIONAL USE (4-6 WEEKS MAXIMUM)



PROPOSES HISTORIC PRESERVATION PARTNERSHIPS





Superintendent Letter to Consulting Parties Key Points

Requests consulting parties to join a virtual meeting to “**provide feedback on the proposed treatments and assistance in developing the MOA and mitigation measures to avoid or minimize impacts on historic properties**” (September 5 potential date)

Draft Wilderness Stewardship Plan/ Environmental Impact Statement (WSP/EIS) published July on 28. 60 Day comment period.

NPS is continuing consultation under Section 106 of the National Historic Preservation Act

NPS anticipates an **adverse effect** on some historic properties. (moldering and removal of historic properties would alter or affect historic properties.)

NPS will prepare a Memorandum of Agreement (MOA) in coordination with the MI SHPO, consulting parties, and the ACHP, as appropriate.

First Blush Potential Adverse Effect Issues

Occupancy – full-time occupancy is not allowed. Occasional, restricted use is allowed. "ethnographic use" is acceptable but ethnographic use is not mentioned in the plan.

Historic Districts – The plan says there is only one Historic District (Tobin Harbor with national significance). Individual structures are listed with local significance with no mention of potential cultural landscape or historic district national significance.

Traditional Cultural Places – The plan does not reference any tribal or non-tribal Traditional Cultural Places (TCPs)

No overnight use for artists - Day use only for Artist in Residence Program at Dassler Camp

Individual camp impacts - Full public access to Glenn's Island, molder Capt. Kidd outbuildings, new trail from Dassler to Snell connected to Scoville trail, remove Johns cabin and convert Johns Island to a campground, molder Mattson fish house.

Partnerships – Partnership framework not fleshed out



Key Takeaways

The level of proposed preservation is significantly higher than previously proposed. This is a major step in the right direction. However, there are adverse effects that should be and can be avoided.

NPS needs to assume that all sites meet regional/national significance until further Historic District, National Landmark, and Traditional Cultural Place studies are completed to avoid adverse effects.

The General Management Plan and MI SHPO both state that limited or no occupancy/use of the camps (as proposed in the plan) will be an adverse effect.

MI SHPO has already stated in the consulting party meetings if NPS walks away from private resources available on the table, it cannot say that it has avoided adverse effect.

Adverse Effects and How They Might Be Avoided

Converting cultural resources in Potential Wilderness to Wilderness is a potential adverse effect.

Leave cultural resources in Potential Wilderness or recommend Wilderness boundary changes to Congress.

Local significance may be regional or national significance.

State that all structures may meet regional or national significance until further Historic District and National Landmark studies are completed.

Historic Districts with potential regional or national significance are not listed in the plan.

Include draft historic district boundaries for Washington Harbor, Belle Isle, Tobin Harbor, and Rock Harbor.

Traditional use and practices are not identified and prioritized.

Confirm tribal and assume non-tribal island-wide TCPs with regional/national significance.



Key Guidance Documents and Resources



1964 Wilderness Act and
1976 P.L. 94-567 & H. Rpt.
94-1427



1966 National Historic
Preservation Act (Section
106)



1998 IRNP General
Management Plan



2010 IRNP Context Study



2011 – 2023 Consulting
Party Meeting Notes



2019 Tobin Harbor
Historic District National
Register Nomination



2019 Non-Wilderness
Cultural Resource
Management Plan



2022 NPS Reference
Manual 41 (RM41)



2022 Draft Bulletin 38
(Traditional Cultural Place
Guidelines)



1964 Wilderness Act

- “Untrammeled by Man”
- No structures and no human habitation with minor exceptions
- NPS must perform a minimum requirement analysis of all potential actions (including for exceptions) that identifies the impact on wilderness character and select actions that have the least impact on wilderness character

1976 P.L. 94-567 & H. Rpt. 94-1427

- “SEC. 3. All lands which represent potential wilderness additions, upon publication in the Federal Register of a notice by the Secretary of the Interior that all uses thereon prohibited by the Wilderness Act have ceased, shall thereby be designated wilderness.”
- [Shelters] “in areas of potential wilderness addition, and these areas shall become wilderness when the shelters are no longer needed. Other potential wilderness additions bearing more substantial development or retention of private rights will likewise convert to wilderness status when the non-conforming uses or rights are terminated.”



1966 National Historic Preservation Act (Section 106)

- “Agencies that have direct or indirect jurisdiction over historic properties are required by section 106 of the National Historic Preservation Act to take into account the effect of any undertaking on properties listed or eligible for listing in the National Register.”

1998 General Management Plan

- “Any impacts on cultural resources would be avoided if possible”
- “As soon as the constant care needed by buildings of this type is ended, they begin to deteriorate.”
- “The other major threat over time to the potential landscapes has been park development and destruction of key elements, such as buildings and docks.”



2010 Historic Context Study

- “The entire island is an historic landscape because of the indelible impact humans have had on the island and how the landscape has shaped human experiences on the island.”
- “The relationship between historic and present-day use of the extant cultural resources and the surrounding terrestrial and maritime landscape is significant.”

2014 – 2018 Consulting Party Meeting Notes

- 2014 MI SHPO: People living in historic structures affect the impact on preservation... without living people you have potential for an adverse impact.
- 2015 - MI SHPO: Artifacts are important to preserve... There are many artifacts, like boats, inside the cabins that are personal property but relate to the historical importance of the cultural resources. All the intangibles, lifeways, views, pathways are not written into the NHP Act but should be considered.
- 2015 - ACHP: NPS must take historic districts into account
- 2015 - ACHP: NPS has to avoid or minimize adverse effects on cultural resources before mitigation is allowed to proceed.
- 2015 - ACHP: There needs to be agreement that the preferred alternative is the BEST it can be. Has the agency avoided, to the best of their ability, any adverse effects? There must be agreement that this is the best it can be. This cannot be underestimated.



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2019 Tobin Harbor Historic District National Register Nomination

- “Members of the Edwards, Connolly, Mattson, Snell, Merritt, and Gale families continue to use and maintain their former camps on Isle Royale, living a simple life style just as previous generations had done, and representing a continuum of use that began in the early years of the 20th century.”
- “What truly distinguishes Tobin Harbor, as well as Washington and Barnum Islands, is that when the National Park Service purchased the properties in 1930s change was essentially arrested. It was not simply arrested, but arrested during the historic period, which is clearly a rare occurrence. Thus, Tobin Harbor effectively represents the historic period with an exceptional level of integrity and authenticity. It also represents a rare surviving example of the property type. This is particularly evident when the highly original interior spaces of Tobin Harbor’s cabins are considered.”

2019 Non- Wilderness Cultural Resource Management Plan

- “NPS has determined that the Undertaking has undetermined effects that may have an adverse effect on historic structures and cultural landscapes on Barnum and Washington Islands, and among those associated with the Rock Harbor Development.”
- “NPS will assume regional or national significance for the Barnum and Washington Islands and Rock Harbor cultural landscapes until National Register applications have been completed.”



2022 NPS Reference Manual 41 – Cultural Resources in Wilderness Guidance

- “Cultural resources in wilderness tell the human story of a place, illuminate the historical, cultural, social, and spiritual values embedded in wilderness landscapes.”
- “Wilderness designation does not diminish the NPS’s fundamental responsibility for affirmatively managing its cultural resources.
- “Ethnographic resources may or may not be identified but should be generally expected where Traditionally Associated Peoples... retain traditional ties to a wilderness area.”

2022 NPS Reference Manual 41 – Procedures for Completing Legal Descriptions and Boundary Maps

- “The National Park Service will correct errors by writing a memorandum from the park superintendent. The memorandum will explain the error in the existing legal description and/or map(s).”
- “Correcting typographical or clerical errors cannot be used to adjust or modify wilderness boundaries to eliminate management problems or concerns. Adjusting or modifying existing wilderness boundaries may be made only by a recommendation to Congress that Congress enacts into law.”

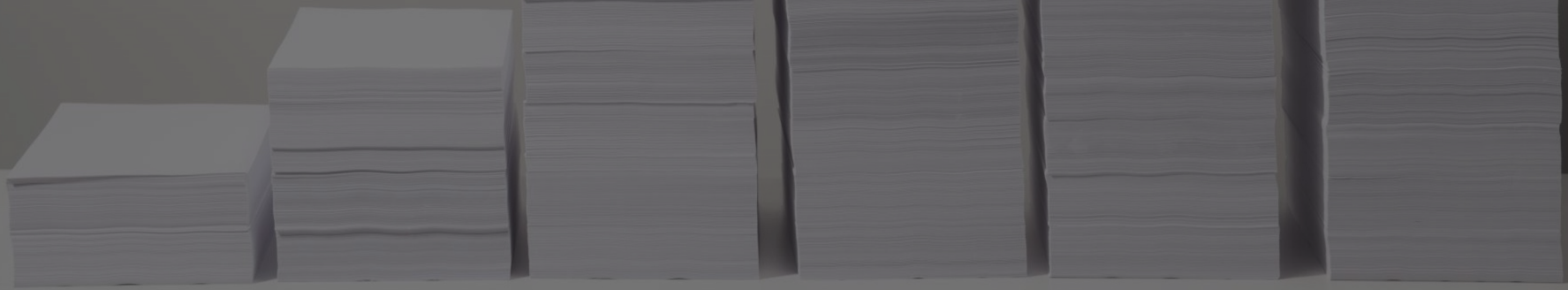


2022 National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Places – Draft Text

- “The 1992 and 1998 issues of the TCP Bulletin gave special attention to places of traditional cultural significance to Indigenous Peoples... The emphasis on Indigenous Peoples in these versions of the TCP Bulletin was not intended to imply that only Indigenous Peoples ascribe traditional cultural value to historic places.”
- “Any effort to identify historic buildings, structures, sites, objects, and districts in a geographic area— whether urban, suburban, or rural—should include a reasonable effort to identify potentially National Register-eligible TCPs.”
- “The knowledge of those who attribute cultural value to a place should be prioritized; after all, it is they who value it, and therefore are the most authoritative about its value.”

A hand is shown at the top right, holding a single sheet of white paper above a stack of papers. The stack is part of a series of five stacks of increasing height from left to right.

Current Condition Photographs



1919 Cabin on Captain Kidd Island proposed for molder

Condition as of August 2023

















