



*Cat Island*



*Bear Island*



*Outer Island Sandspit*



*Gull Island*

**CHAPTER 2:  
FRAMEWORK  
FOR MANAGEMENT,  
USE AND  
ADMINISTRATION  
OF THE GAYLORD  
NELSON WILDERNESS**



# INTRODUCTION

This chapter provides general directions for management of the Gaylord Nelson Wilderness. A variety of administrative/operational topics are covered, including the minimum requirement process, natural and cultural resource management, scientific activities/research, administration/operations, and monitoring of wilderness character. All of the management directions included here would not vary among the alternatives in chapter 3—the directions would be followed regardless of which alternative was selected for the *General Management Plan / Wilderness Management Plan*. The directions are based on the Wilderness Act and NPS policies, including *NPS Management Policies 2006*, Director's Order 41 and Reference Manual 41 ("Wilderness Preservation and Management"), white papers from the NPS National Wilderness Steering Committee, and the "Wilderness Stewardship Plan Handbook. Level II Guidance: Wilderness Stewardship Plan EIS/EA Details" (NPS 2004a).

This chapter does not cover several topics that are addressed in chapter 3, including management zoning, user capacity indicators and standards, and campsites in the wilderness area. The management zones and directions provided for these topics in chapter 3, plus the general directions provided in this chapter, and the wilderness management desired conditions and strategies identified in table 1 in chapter 1 altogether make up the management plan for the Gaylord Nelson Wilderness.

## WILDERNESS CHARACTER

The 1964 Wilderness Act states, "it is hereby declared to be the policy of Congress to secure for the American people of present and

future generations the benefits of an enduring resource of wilderness." One of the central mandates of this act is to preserve wilderness character. Section 2(a) states that wilderness areas shall be administered "so as to provide for the protection of these areas, the preservation of their wilderness character . . ." Section 4(b) states,

"Except as otherwise provided in this Act, each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area and shall so administer such area for such other purposes for which it may have been established as also to preserve its wilderness character."

Wilderness character is not specifically defined in the 1964 Wilderness Act, nor is its meaning discussed in the act's legislative history. However, wilderness managers have identified four qualities of wilderness character based on the statutory language of the Wilderness Act (U.S. Forest Service 2008): untrammeled; natural; undeveloped; and offering solitude or a primitive and unconfined type of recreation.

- Untrammeled—This refers to wilderness as being essentially unhindered and free from modern human control or manipulation. Actions that intentionally manipulate or control ecological systems inside wilderness degrade the untrammeled quality of wilderness character—even if an action is taken to restore natural conditions.
- Natural—This means areas that are largely free from effects of modern civilization—there is an absence of people and their activities. It also refers to the maintenance and perpetuation of natural ecological

relationships and processes, and the continued existence of native wildlife and plants in largely natural conditions.

- Undeveloped—The Wilderness Act states that wilderness is “an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation,” “where man himself is a visitor who does not remain” and “with the imprint of man’s work substantially unnoticeable.” Thus wilderness is essentially without permanent improvements or modern human occupation.
- Offering solitude or a primitive and unconfined type of recreation—This quality is about the opportunity for people to experience wilderness. Solitude means encountering only a few people, if any, and experiencing privacy and isolation. There is an absence of distractions, such as large groups of people; mechanization; and unnatural noises, signs, and other modern artifacts. There is freedom from the reminders of modern society. Primitive and unconfined recreation refers to the freedom of visitors to explore with few or no restrictions, and the ability to be spontaneous. It means self sufficiency without support facilities or motorized transportation, and directly experiencing weather, terrain, and other aspects of the natural world with minimal shelter or assistance from devices of modern civilization.

Based on the Wilderness Act’s mandate to preserve wilderness character, this discussion focuses on the extent to which the alternatives in this document affect these characteristics of the Gaylord Nelson Wilderness area. Wilderness character and wilderness experience are analyzed together because much of wilderness character can only be subjectively determined by the visitor’s experience (for example, solitude or freedom of movement). Impacts on natural and cultural resources, visitor access, soundscape,

and other resources in the wilderness area are evaluated elsewhere in the “Environmental Consequences” chapter.

## **HISTORY OF WILDERNESS AT APOSTLE ISLANDS NATIONAL LAKESHORE**

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)).

The 1989 *General Management Plan, Apostle Islands National Lakeshore*, called for a formal wilderness study for Apostle Islands National Lakeshore. In the 2001 Department of Interior appropriations bill, Congress specifically directed the National Park Service to conduct a wilderness study for the park. The wilderness study was completed in May 2004 with a proposal to designate approximately 80% of the park’s land area as wilderness. Later that year Congress approved

designation of the wilderness area as part of the Consolidated Appropriations Act of 2005 (PL 108-447, Division E, §140). On December 8, 2004, President Bush signed the law, establishing the Gaylord Nelson Wilderness. Eighteen of the 21 islands in the park are all or partially within the wilderness area—only Basswood, Sand, and Long islands have no designated wilderness. Figure 3 shows the boundaries of the wilderness area on the ten islands that have nonwilderness areas. (For more details on the history of establishment of the wilderness area, see Krumenaker 2005).

## WILDERNESS MANAGEMENT GOALS AND PHILOSOPHY

The Gaylord Nelson Wilderness will be managed in a manner that is consistent with the Wilderness Act, national wilderness policies, and NPS management policies. The primary goals for managing the Gaylord Nelson Wilderness are to

- protect and preserve the area’s natural and cultural resources and values, and the integrity of the wilderness character for present and future generations
- provide for freedom of public use and enjoyment of the wilderness area in a manner that is consistent with the Wilderness Act, NPS management policies, park purposes, and the protection of resources and values
- provide for public understanding and support of wilderness values

As stated in chapter 1, one of Apostle Islands National Lakeshore’s primary purposes is to preserve and protect the park’s wilderness character for use and enjoyment by future generations *as wilderness*. Wilderness character is the combination of biophysical, experiential, and symbolic qualities in an untrammelled and natural state that generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable.

The desired conditions for wilderness management, described in table 1 in chapter 1, complement the above goals.

In order to protect and promote wilderness character, wilderness management must consider the purpose of an action and the spirit in which it was carried out. The definition of wilderness in the Wilderness Act identifies two key qualities:

- generally appearing to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable, and
- having outstanding opportunities for solitude or a primitive and unconfined type of recreation

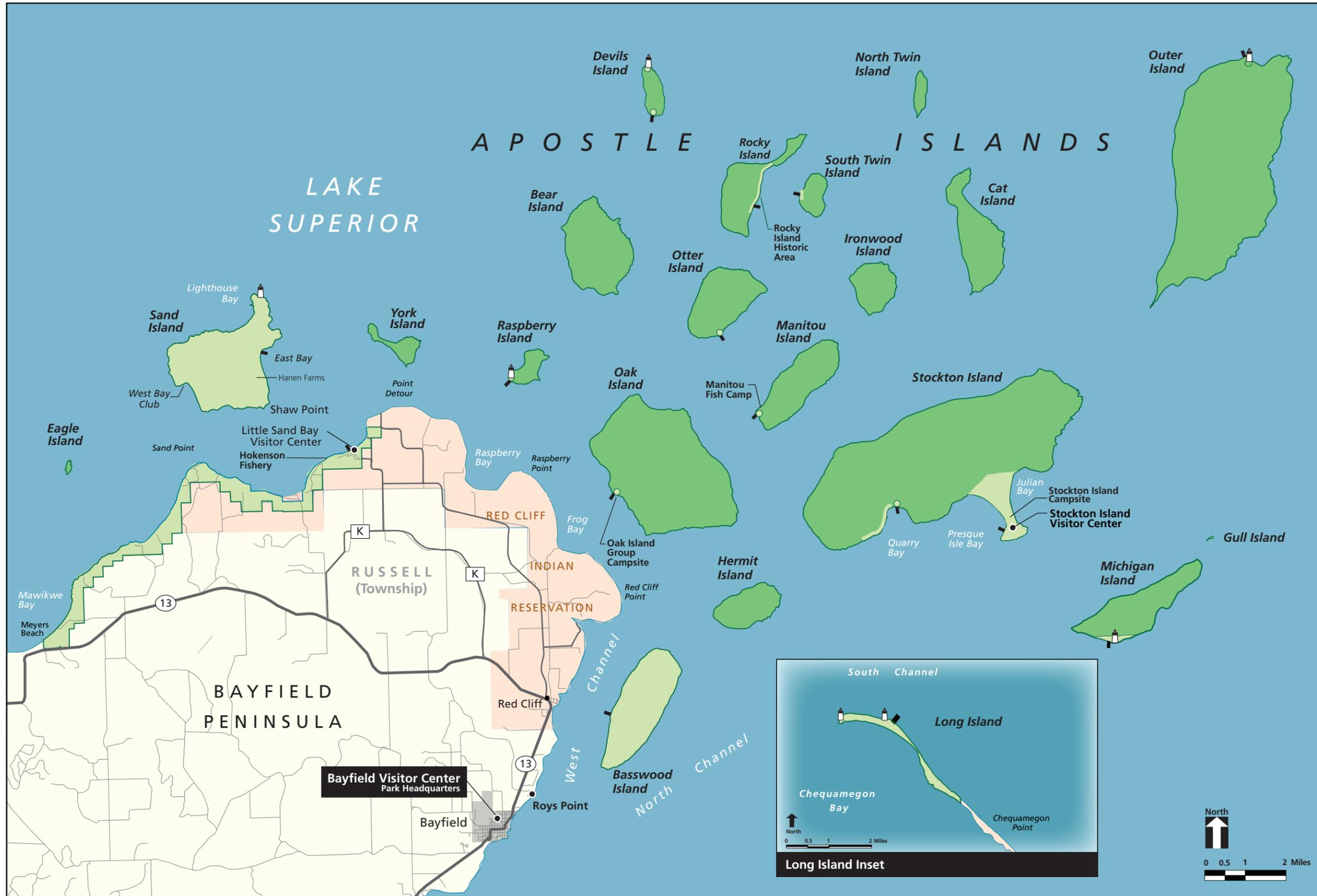
Providing opportunities for solitude would include managing for visitor experiences with the following characteristics:

- freedom from the reminders of society
- privacy and isolation in natural surroundings
- absence of distractions such as large groups, mechanization, unnatural noise, signs, and other modern artifacts within the wilderness area (however, the Wilderness Act offers no protection from sights and sounds originating outside of wilderness)

However, at its essence wilderness character is unseen and immeasurable—a unique challenge of wilderness management. Wilderness character includes the natural and scenic condition of the land, interactions of wildlife, and the integrity of ecological processes. But wilderness character, like personal character, is much more than a physical condition.

The National Park Service recognizes the intangible values of wilderness, and in implementing this plan would forego actions that might have no seeming physical impact

but which would detract from the idea of wilderness as a place set apart; a place where human uses, convenience, and expediency do not dominate; a place where we can know ourselves as part of something beyond our modern society and its creations.



- Gaylord Nelson Wilderness
  - Non-wilderness
  - (Non-wilderness symbol designates smaller zone)
- 
- Bayfield
  - Indian Reservation
  - Lands Outside of the Park
- 
- Lighthouse
  - Dock

**FIGURE 3**  
**Gaylord Nelson Wilderness**  
 Apostle Islands National Lakeshore

National Park Service  
 U.S. Department of the Interior  
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# USES, DEVELOPMENTS, AND MANAGEMENT ACTIONS PERMITTED AND PROHIBITED IN WILDERNESS

The following table summarizes what recreational uses, management actions, and developments are permitted and prohibited in

wilderness areas under the Wilderness Act of 1964 and NPS policies.

**Table 3: Uses, Developments, and Management in Wilderness**

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
- American Indian religious activities and other actions recognized under treaty-reserved rights
- guided interpretive walks and onsite talks and presentations
- wheelchair use by individuals whose disability requires its use, if that wheelchair meets both parts of the definition of a wheelchair as stated in the Americans with Disabilities Act Title V, section 508c: “the term wheelchair means a device designed solely for use by a mobility impaired person for locomotion, that is suitable for use in an indoor pedestrian area”
- scientific activities, research, and monitoring (provided the activities are appropriate and use the minimum tool required to achieve project objectives)
- 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) as approved in the fire management plan
- preservation of historic properties eligible for the National Register of Historic Places
- trails necessary for resource protection and/or for providing for visitor use for the purposes of wilderness
- campsites when essential for resource protection and preservation or to meet other specific wilderness management objectives, including those facilities necessary for resource protection or visitor safety (e.g., tent pads, bear-proof storage boxes)
- toilets, signs, and other infrastructure necessary for visitor safety or to protect wilderness resources
- certain administrative facilities if necessary to carry out wilderness management objectives (e.g., storage or support structures, ranger station)
- uses and facilities permitted for landowners or lessees with valid property rights in a wilderness area

**NOTE:** For administrative management actions and all of the above facilities, the management actions and facilities must be determined to be the minimum necessary to meet the purposes of wilderness (e.g., essential for resource protection and preservation, essential for administration of a wilderness area). See the next section for guidance on the minimum requirement concept.

The Wilderness Act also specifically *prohibits* certain uses and developments:

- permanent improvements or human habitation (§2(c) of the Act)
- structures or installations (§4(c))
- permanent and temporary roads (§4(c))

- use of motor vehicles and motorized equipment (except for emergency purposes) (§4(c))
- landing of aircraft (except for emergency purposes) (§4(c))
- other forms of mechanical transport (e.g., bicycles) (§4(c))
- 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) (§4(c) and §4(d)(6))

With the exception of permanent roads and commercial enterprises, the Wilderness 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 (unless necessary for health and safety purposes or determined to be necessary through a minimum requirement analysis)
- borrow pits (except for small quantity use of borrow material for trails)
- new shelters for public use
- picnic tables, except when necessary for resource protection
- interpretive signs, trails, and waysides (unless necessary for visitor safety or to protect wilderness resources)

## APPLYING THE MINIMUM REQUIREMENT CONCEPT

The Wilderness Act of 1964 states in section 4(c)

except as necessary to meet the minimum requirement for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area) there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing aircraft, no other form of mechanical transport, and no structure or installation... within a wilderness area.

The act allows for the administrative exception, but it is an exception not to be abused and to be exercised very sparingly and only when it meets the test of being the minimum necessary for wilderness management. NPS policy dictates that all management decisions affecting wilderness must be consistent with the minimum requirement concept.

In wilderness, how a management action is carried out is as important as the end product.

### Minimum Requirement Concept

“The minimum requirement concept is a documented process used to determine if administrative actions, projects, or programs undertaken by the National Park Service or its agents and affecting wilderness character, resources, or the visitor experience are necessary, and if so how to minimize impacts.”

*NPS Management Policies 2006 (6.3.5)*

When determining the minimum requirement, the potential disruption of wilderness resources and character will be considered before, and given more weight than, economic efficiency and convenience. If a compromise of wilderness resources or character is unavoidable, only those actions that preserve wilderness character in the long run and/or have localized, short-term adverse impacts will be accepted.

The second part of the minimum requirement concept is identifying the minimum tool, which is defined as the least intrusive tool, equipment, device, force, regulation, or practice that would achieve the wilderness

management objective safely and with the least impact on wilderness resources.

To apply the minimum requirement concept, a minimum requirement analysis will be completed for proposed management actions, including but not limited to natural and cultural resource projects, administrative facilities, trail and campsite projects, and research. (Where actions take place outside the wilderness, consideration should also be given to how those actions may have indirect effects on wilderness character and values.) Completion of the minimum requirement analysis is part of the environmental screening process and accompanies the appropriate environmental compliance and may be subject to public review prior to approval.

The minimum requirement analysis is a two-step process. Step 1 helps determine whether or not the proposed management action is appropriate or necessary for administration of the area as wilderness, and does not pose a significant impact to wilderness resources and character. The assessment of adverse impacts must consider physical resources within the wilderness as well as wilderness character and values. Step 2 describes alternatives for the proposed action and evaluates each to determine if the techniques and tools and equipment (minimum tool) needed to ensure that overall impacts to wilderness resources and character are minimized. The minimum requirement analysis worksheet and instructions for its completion are in appendix B.

### **APPROPRIATE NATURAL RESOURCE CONSERVATION AND RESTORATION ACTIVITIES IN WILDERNESS**

The 1964 Wilderness Act defines wilderness as a place that “in contrast with those areas where man and his own works dominate the landscape, is ... an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain.” It is to be “protected and managed so

as to preserve its natural conditions” and “generally *appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable.*”

Although these ideas have much in common, they aren’t the same. As established by the act, the objectives to manage wilderness for the forces of nature (ecological conditions, what some consider “naturalness”) and to keep the wilderness untrammelled and to minimize the impacts of people (what some consider “wildness”) can be in conflict. Notwithstanding the islands’ long and continuing history of use by American Indians and the park’s embrace of their history in the Gaylor Nelson Wilderness, the National Park Service must grapple with how to manage those parts of the wilderness where former logging camps, quarries, and farms are present.

Although hands-off management was probably once sufficient to keep wilderness both natural and untrammelled, land managers now realize that human use of the landscape has left some areas with nonnative or invasive plants; threatened, endangered, and extirpated plants and animals; compacted soils; artificial fire regimes; trash piles; etc. The National Park Service is fully committed to the preservation of the tangible remnants that are historically significant (an equally challenging concept, also defined in federal law). However, NPS managers are faced in some other cases with the dilemma of whether to attempt to restore natural conditions or to leave an area alone. If the latter path is selected, some areas will restore themselves to ecological integrity over time, but other areas are likely to remain in an unnatural state without active intervention. Further complicating the picture, human-induced climate change will likely favor some species over others, and will likely lead to unprecedented ecological conditions that, if managers do not intervene, may appear “untrammelled” but will hardly be “natural.” Managers will be faced with the dilemma of artificially aiding some species to try to

preserve them in their native habitat, or else accept their loss as the conditions they require disappear from the park.

With regard to natural resource management in wilderness, NPS wilderness policies state:

The principle of non-degradation will be applied to wilderness management, and each wilderness area's condition will be measured and assessed against its own unimpaired standard. Natural processes will be allowed, in so far as possible, to shape and control wilderness ecosystems. Management should seek to sustain natural distribution, numbers, population composition, and interaction of indigenous species. Management intervention should only be undertaken to the extent necessary to correct past mistakes, the impacts of human use, and the influences originating outside of wilderness boundaries. Management actions... should be attempted only when the knowledge and tools exist to accomplish clearly articulated goals. (NPS "Reference Manual 41: Wilderness Preservation and Management," §6.3.7)

Thus, conservation and restoration activities should occur only when necessary, and the threshold for taking management actions (intervention) is particularly high in wilderness. Managers should err on the side of intervening as little as possible in wilderness.

The question of when such actions should be taken is often difficult to answer. In light of how much past and present human activities have altered the Gaylord Nelson Wilderness, including logging, recreational uses, clearing of areas and developments, the introduction of nonnative species, and climate change, the concept of maintaining "natural conditions" does not provide much guidance on whether or not to actively intervene (see the description of the park's vegetation in chapter 4 and Cole et al. 2008 for more discussion on the question of naturalness in protected areas).

### Managing for Wilderness Characteristics

Two key terms need to be considered in determining whether conservation and restoration activities are appropriate in wilderness:

**Wild**—untrammelled; uncontrolled; unconstrained; without sign of people or intentional human control; on its own terms; self-willed; free.

**Natural**—unimpaired; ecologically intact, with the full complement of native species; sustainable; unpolluted.

These terms, ideally, are not mutually exclusive. Scientists, philosophers, and managers continue to debate their meanings as well as the intent of the Wilderness Act. Did the authors of the act anticipate a world affected by climate change and other human influences that would pervade every corner of the globe, no matter how remote? The challenge for the National Park Service clearly is how to manage for both wild and natural, without compromising either, in the Gaylord Nelson Wilderness.

In considering whether or not to take action, managers of the Gaylord Nelson Wilderness in Apostle Islands National Lakeshore should define as precisely as possible what outcomes are desired before determining how much intervention is warranted. The following questions (as well as the minimum requirement process criteria) can help guide managers in their decision:

- Is the extent and significance of diminished naturalness known?
- Is action needed to maintain ecological integrity—the presence of all appropriate elements and processes operating at appropriate rates?
- Is the action needed to promote resilience of the wilderness—the capacity of the system to absorb change and still persist without undergoing a fundamental loss of character? Is action needed because little

semblance of natural conditions is possible without intervention?

- What is the intensity of the proposed action—how big an area will be affected over how long a time? Is the intervention short or long term?
- Is there sufficient understanding about reference conditions and processes, as well as the long-term effects of the action?
- What are the benefits and risks of taking action versus not taking action? Is the threat or change facing the wilderness considered to be a high priority? Does the action have the most potential to make a difference?
- Is there public understanding and support for the action?

(Additional questions and ideas can be found in Cole and Young 2010; Cole et al. 2008; Landres 2004; and Landres 2002.)

The NPS National Wilderness Steering Committee also has provided a guide for evaluating the appropriateness of restoration and other conservation activities in wilderness. Recognizing that which actions should be taken versus avoided will be location specific and subjective, the following three-tiered framework can help managers in structuring their decision.

**Class I: Short-term wilderness disturbance; long-term wilderness character enhancement**

This class of activity entails one-time reversals of anthropogenic changes that, once accomplished, are self-sustaining. Users of wilderness might well encounter restoration activities that would typically result in impacts to wilderness character lasting a season to perhaps several years. Often, these impacts include temporary markers such as flagging, or tags and radio-collars on animals. Some of this, such as dam removal, may require heavy equipment. Upon completion, however, traces of the restoration activity would be

extinguished over a short period of time, while the benefits of “re-wilding” and naturalness to wilderness character would be long term.

**Examples**

- reintroduction of self-sustaining native species
- extirpation of invasive alien species

**Class II: Long-duration or recurring entry; benefits and costs to wilderness character**

Many ecosystems that include wildernesses suffer anthropogenic disturbances for which managers lack the knowledge, the legal authority, or the financial resources to correct permanently at the present time. For example, introduced weedy plants often invade natural areas from adjacent lands, and require regular removal and frequent monitoring. These nature-maintenance activities reflect the reality that many designated wildernesses are simply too small or disconnected to sustain their full suite of ecosystem functions without intervention. NPS managers must ultimately weigh the restoration benefits to the ecosystem against the impacts to other aspects of wilderness character.

**Examples**

- periodic control of persistent introduced species
- reintroduced species requiring continuing support

**Class III: Support of laws or NPS policies; don't directly enhance wilderness character**

These activities can present substantial impacts on wilderness character. They clearly violate the intent of the Wilderness Act. Some of these, such as control of pests, reflect the incapacity of some landscapes designated as wilderness to function as such either ecologically or politically. On the other hand, some severe interventions, such as the

removal of native organisms for restoration elsewhere, illuminate the fundamental and unavoidable connections between many wildernesses and their surrounding, more modified landscapes. Ultimately, decisions in this category may require a public review for their resolution.

#### Examples

- habitat modification for endangered species
- regulation of predator or prey numbers when an area is too small for natural regulation or natural controls have been lost
- control of native pests or dangerous species to protect life or property outside wilderness
- removal of native organisms in support of restoration elsewhere

### **FIRE MANAGEMENT**

The park's 2005 *Fire Management Plan / Environmental Assessment* provides guidance on management of fire in the wilderness area. Human-caused fires would be suppressed, although the use of minimum impact suppression techniques would be required. Natural ignition of wildland fires would be permitted to occur, in keeping with the idea that natural forces should predominate in wilderness. Prescribed burns could be proposed in wilderness to restore "natural conditions."

As noted in Director's Order 41: "Wilderness Preservation and Management," all wildland fires (unplanned ignitions) in the Gaylord Nelson Wilderness will be managed to include the application of minimum requirement suppression techniques (if needed), and the consideration of firefighter and public safety, a cost/benefit analysis, and sensitive natural and cultural resources.

### **MANAGEMENT OF CULTURAL RESOURCES**

The Gaylord Nelson Wilderness includes many cultural resources, including archeological sites, historic structures, ethnographic resources, and cultural landscapes. Cultural resources are included under the Wilderness Act as part of wilderness and historic values to be protected. In addition, laws intended to preserve the nation's cultural heritage, including the National Historic Preservation Act, Archeological Resources Protection Act, and American Indian Religious Freedom Act, (among others), all fully apply in wilderness. Any adverse impacts on cultural resources in the Gaylord Nelson Wilderness will be avoided if at all possible. Any actions that involve ground disturbance or possible disturbance of historic structures or cultural landscapes must involve mitigative measures developed by the park staff in consultation with the Wisconsin state historic preservation office and, as appropriate, the Red Cliff and Bad River Bands of the Lake Superior Chippewa.

As called for in §6.3.8 of Reference Manual 41, "Wilderness Preservation and Management," historic properties eligible for the National Register of Historic Places in the Gaylord Nelson Wilderness will be protected and maintained according to the pertinent laws and policies governing cultural resources. However, the methods used to protect and maintain cultural resources must be consistent with the preservation of wilderness character and values—the provisions of the Wilderness Act must be complied with when conducting cultural resource management activities, including inventory, monitoring, treatment, and research. If these management actions are proposed in the wilderness area, they must be evaluated in the minimum requirement process to minimize negative impacts to wilderness character and values.

It is important to stress that many actions affecting cultural resources in the wilderness

area will only be undertaken after appropriate consultations with the Wisconsin state historic preservation office, associated American Indian tribal governments, other interested agencies or organizations, and the general public.

If appropriate, park staff may manage encroaching vegetation growing directly on or within former logging camp ruins and quarries in the wilderness area to protect them from accelerated decay. Any such action would be subject to the minimum requirements process, and appropriate NEPA compliance and consultations with the state historic preservation office, associated tribal historic preservation offices, other interested agencies, and members of the general public.

### **AMERICAN INDIAN TREATY RIGHTS AND ACCESS**

As noted in chapter 1, several Lake Superior Chippewa tribes have hunting, trapping, and gathering rights guaranteed by treaty in Apostle Islands National Lakeshore, including the wilderness area. The National Park Service will honor those legally established rights and cooperate with the tribes holding those rights. American Indian access also will be permitted in the wilderness for sacred or religious purposes consistent with the intent of the American Indian Religious Freedom Act, Executive Order 13007: “Indian Sacred Sites” of May 24, 1996, the Wilderness Act, and related laws and policies.

### **HUNTING AND TRAPPING**

As noted in chapter 1, hunting and trapping are permitted uses in the park, including the wilderness area. Harvest limits and dates and seasons for hunting and trapping are the same in the wilderness area as in the rest of the park. Approved hunting and trapping methods will be consistent with NPS wilderness management.

### **ACCESSIBILITY FOR PERSONS WITH DISABILITIES**

NPS management policies ensure that equal opportunities are available for people with disabilities in all programs and activities, including the opportunity to participate in wilderness experiences. In addition, under section 504 of the Rehabilitation Act and 29 CFR part 17, the National Park Service has legal obligations to ensure that no person who has a disability is denied the opportunity to participate in a program solely because they have a disability. All people, including those who have disabilities, are to be allowed to participate as long as they are able “to achieve the purpose of the program or activity without modification to that program or activity that fundamentally alters the nature of that program or activity.”

The 1968 Architectural Barriers Act (ABA), passed a year after the Wilderness Act, requires that when a federal agency constructs or alters a facility, that facility is to be accessible. Congress clarified the issue of accessibility in federal wilderness in the 1990 Americans with Disability Act (ADA), even though this act does not normally apply to federal agencies.

Title V section 507 of the Americans with Disabilities Act specifies that, in federally designated wilderness, a person who has a mobility impairment may use a wheelchair that (1) is designed solely for use by a mobility impaired person for locomotion, and (2) is suitable for use in an indoor pedestrian area. Wheelchairs or mobility devices that meet both parts of this definition are legally recognized as wheelchairs when used for locomotion by a person who has impaired mobility, may be used anywhere foot travel is allowed, and are not to be considered as forms of mechanical transport. Section 507 of the act further states that “no agency is required to provide any form of special treatment, or accommodation, or to construct any facility or modify any conditions of lands within a wilderness area to facilitate such use.”

In the case of the Gaylord Nelson Wilderness, all visitors will be encouraged to enjoy the wilderness on its own terms. Few additional facilities are anticipated during the life of this plan, and those that are constructed will only be added if they provide essential environmental protection and are appropriate to the setting. In those cases, the facility design will be accessible consistent with federal law and NPS policy. Whenever feasible, the National Park Service will go beyond the legal requirements and make the facilities as accessible as possible using a wilderness-appropriate primitive design. The park staff will work with Wilderness Inquiry, Inc., on adopting best practices with regard to accessibility in the Gaylord Nelson Wilderness. (The National Park Service has a national memorandum of understanding with Wilderness Inquiry, Inc., to provide assistance related to the concerns and needs of disabled people.)

## SPECIAL EVENTS

NPS *Management Policies 2006* (6.4.5) states that the agency will not sponsor or issue permits for special events in wilderness if the events are inconsistent with wilderness resources and character, or if they do not require a wilderness setting to occur. Permits will not be granted for competitive events, such as races, to take place in wilderness.

## INTERPRETATION AND EDUCATION

Public information is a critical component of any wilderness management program. Education is important for park visitors, the public who do not visit the park, and NPS and partner employees. With regard to wilderness, education and interpretation efforts will focus on the following areas:

- promoting and perpetuating public awareness and appreciation for wilderness character, resources, and ethics while providing for acceptable use limits

- fostering an understanding of the concept of wilderness that includes respect for the resource and willingness to exercise self-restraint in demanding access to it
- encouraging the public to use and accept wilderness on its own terms, recognizing wilderness is an undeveloped, primitive environment and that there are potential risks and responsibilities involved in using and enjoying wilderness
- fostering public stewardship, Leave No Trace ethics, and minimizing adverse human impacts to wilderness resources and values
- presenting information on wilderness safety
- as the wilderness is named for Gaylord Nelson, information and education efforts will also seek to educate visitors about the former Wisconsin governor and senator and his conservation legacy

Wilderness character and resources, as well as the above points, will be included in the park's interpretation and educational program and as an integral element in the park's long-range interpretive plan and annual implementation plan. Appendix I of Reference Manual 41 provides a description of primary interpretive themes for NPS wilderness areas.

A variety of education and interpretive outreach approaches may be used to provide visitors and the public with information on the Gaylord Nelson Wilderness—such as talks and other presentations, waysides, publications, exhibits in visitor centers, web page sites, and curriculum-based education programs—so long as they do not adversely affect the wilderness character. NPS staff will work closely with local educators to develop appropriate curricula and identify appropriate activities in the wilderness.

Staff education is also an important part of the wilderness education effort. Wilderness awareness training will be incorporated into all appropriate training programs, such as

orientation training for seasonal and new staff, concessions staff, and volunteers.

Education may also be used as a tool for addressing wilderness use and management problems, and will generally be applied before more restrictive management actions.

## CAMPING PERMITS

Permits are currently required for all individuals and groups camping in the park, including designated sites and designated camping zones in the wilderness. Permits can have many uses, including the following:

- providing education concerning resource protection and Leave No Trace practices
- providing education concerning safety issues
- providing a means to track visitor use
- identifying a starting point for search and rescue efforts
- regulating use

## COMMERCIAL SERVICES

Under the Wilderness Act commercial enterprises are not permitted in wilderness, with the exception of commercial services deemed necessary for realizing the recreational or other wilderness purposes of the area. Under *NPS Management Policies 2006* (10.3.1) commercial services need to be determined to be an appropriate use of the park.

Commercial guiding (e.g., kayaking, fishing, sailing, and backcountry trips; adventure boat tours; and water taxi services) is a permitted use in Apostle Islands National Lakeshore and is consistent with the park's wilderness management objectives and has long been deemed appropriate for the following reasons:

- services are consistent with the purposes and values for which the park and wilderness area were established, as well

as with applicable laws, regulations, and policies

- services are consistent with laws, regulations, and policies
- services do not compromise public health, safety, or well-being
- services do not result in unacceptable impacts on wilderness resources and values
- services do not unduly conflict with other authorized park uses and activities or services outside the park
- services do not monopolize limited recreational activities at the expense of the general public

Commercial use authorization (CUA) permits are required of all businesses, groups, organizations, or individuals that provide guided trips and/or services for hire in the park. For nonprofit groups special use permits are required. Both types of permits do not limit the number of organizations providing these services.

The use of permanent equipment and supply caches by commercial operators is prohibited within all areas of the park. Commercial operators also must adhere to the minimum requirement concept in all aspects of their activities in wilderness.

## SCIENTIFIC ACTIVITIES AND RESEARCH

The Wilderness Act, *NPS Management Policies 2006* (6.3.6), and Director's Order 41 all provide for and encourage scientific activities in wilderness when they are consistent with the National Park Service's responsibilities to preserve and manage wilderness.

Scientific activities are to be encouraged in wilderness, provided that the benefits of what may be learned outweigh the negative impacts on other wilderness values.... The increase of scientific knowledge, even if it serves no immediate management purpose, may

be an appropriate wilderness research objective when it does not compromise wilderness resources and character. (Director's Order 41)

Thus, scientific activities that potentially impact wilderness resources or values, including access, ground disturbance, use of equipment, and animal welfare, would be permitted provided the benefits of the gained knowledge outweigh the impacts to wilderness resources or values.

However, Director's Order 41 also stresses it is important for scientists to understand that their research be conducted in accord with wilderness preservation principles. All scientific activities, including the installation, servicing, removal, and monitoring of research devices, must be evaluated using the minimum requirement concept and include documented compliance that assesses impacts against benefits to wilderness. Applications for research and scientific work in the wilderness area must include a minimum requirements analysis of the project's methodologies. Scientific activities that involve activities or structures prohibited in §4(c) of the Wilderness Act (e.g., motorized equipment, mechanical transport) may occur in wilderness if several requirements are satisfied (see 6.3.6.1 in the *NPS Management Policies 2006*).

Research and monitoring devices may be installed and operated in the Gaylord Nelson Wilderness if

- the desired information is essential for the administration and preservation of wilderness and cannot be obtained from a location outside wilderness without a significant loss of precision and applicability; and
- the proposed device is the minimum requirement necessary to accomplish the research objective.

The devices will be removed when determined to no longer be essential. Permanent equipment caches are prohibited

in wilderness; temporary caches may be permitted if they satisfy the minimum requirement concept.

## **CAMPSITE DESIGNATION CRITERIA**

Existing designated campsites may need to be reconfigured and/or additional designated campsites may need to be established in the wilderness area. New sites would be selected based on the following criteria:

- resource protection would be of primary importance
- campsites would be placed out of view of trails
- campsite placement would be subject to cultural resource mitigation

Appendix C provides further details on campsite design considerations for wilderness and nonwilderness.

## **NPS ADMINISTRATION / OPERATIONAL ACTIVITIES AND FACILITIES**

### **Administrative Use of Motorized or Mechanized Equipment**

Administrative use of motorized or mechanized equipment must meet the requirements of the minimum requirement concept (see "Applying the Minimum Requirement Concept" earlier in this chapter and in appendix B). Convenience or economic efficiency alone are not considered sufficient justification for the use of motorized or mechanized equipment. Acceptable uses would include emergencies where human life is at risk, or where use of this equipment is determined to be the least intrusive method on wilderness character and values to accomplish management objectives.

Within two years of completion of this plan, broad minimum requirement analyses will be done for routine maintenance projects in the wilderness (e.g., trails, campsites). Thus, the minimum requirement process will not have

to be applied to each individual project in the future unless there are Wilderness Act exceptions.

### Use of Native Materials

In keeping with wilderness character, local natural materials are preferred when possible to repair or construct wilderness facilities (e.g., water bars, campsites) or restore desired conditions to impacted areas. Any proposed rehabilitation or construction will need to go through the environmental screening process, including the completion of the minimum requirement analysis, and be approved by the wilderness committee.

### Emergency Services

Protecting human health and safety is a priority for park managers. Although wilderness is to be experienced on its own terms with inherent risks and challenges, NPS staff will continue to provide emergency services for all park visitors. During emergency incidents, consideration will be given to protecting the park's wilderness resources. While hazard mitigation may be required, under no circumstances will pure convenience dictate the destruction of any wilderness resources. Leave No Trace minimum impact techniques will be incorporated into incident action plans and used whenever possible to lessen impacts to wilderness resources during emergency operations.

NPS *Management Policies 2006* (6.3.5) provide for the administrative use of motorized equipment or mechanical transport in emergency situations involving human health and safety. For the purposes of this plan, emergency situations include the following:

- response to those in need of medical or physical assistance when threats to human health and safety are reasonably assumed
- response to those who are determined to be unjustifiably overdue and threats to human health and safety are reasonably assumed

- any response to downed aircraft
- any response to an “unknown emergency” (e.g., mirror flash, second-hand visitor report, radio distress signal)
- any reported disaster
- special law enforcement operations when threats to human health and safety are reasonably assumed
- responses to wildland fires that threaten life, property, cultural, or natural resources

Logistics of the park, however, do not necessarily mean that use of motorized/mechanized equipment will either decrease response time or increase visitor safety.

### Administrative Facilities

As stated in NPS *Management Policies 2006* (6.3.10), NPS administrative facilities (e.g., patrol cabins, radio repeater sites, storage or support structures) will be limited in wilderness to the types and minimum number essential to meet the minimum requirements for the administration of the wilderness area. Permanent storage caches are prohibited in wilderness unless necessary for health and safety purposes or when they are determined to be necessary through a minimum requirements analysis.

A decision to construct, maintain, or remove an administrative facility will be based primarily on whether or not the facility is required to preserve wilderness character or values, not on considerations of administrative convenience, economic effect, or convenience to the public or park staff.

No administrative facilities are within the Gaylord Nelson Wilderness, and none are foreseen as being needed to administer the wilderness area.

### Signs

Signs detract from wilderness character and make the imprint of people and management

more noticeable. Consequently, NPS *Management Policies 2006* (6.3.10.4) state that only signs necessary for visitor safety or to protect wilderness resources are permitted in wilderness. Signs that provide other information, such as natural and cultural history, will not be located within the wilderness area. If needed, signs in the Gaylord Nelson Wilderness would be the minimum size and number necessary and would be compatible with their surroundings. Inappropriate signs predating the establishment of the wilderness will be removed within two years of the implementation of this plan.

### **Monitoring of Wilderness Character**

Wilderness character has been described as the combination of biophysical, experiential, and symbolic ideals that distinguishes wilderness from other lands. These ideals combine to form a complex and subtle set of relationships among the land, its management, its users, and the meanings people associate with wilderness. (Interagency Wilderness Character Monitoring Team 2008)

Both the Wilderness Act and NPS *Management Policies 2006* (6.3.1) mandate that the Gaylord Nelson Wilderness character be preserved. To ensure that wilderness character is not deteriorating or being altered requires monitoring. NPS *Management Policies 2006* (6.3.6.2) also require that conditions and long-term trends of wilderness conditions be monitored.

Visitor impacts on wilderness and monitoring of user capacity indicators and standards is one facet of wilderness character. However, these indicators are addressed in chapter 3. This section instead focuses on monitoring indicators of wilderness character that are not directly tied to visitor impacts (although there may be some overlap between the two sets of indicators). The monitoring being addressed in this section is also different from the NPS

inventory and monitoring program's vital signs effort (although again there may be some overlap in the monitoring efforts).

The Interagency Wilderness Character Monitoring Team has identified four key wilderness qualities may be monitored as an approximation of wilderness character:

- untrammeled—wilderness is essentially unhindered and free from modern human control or manipulation
- natural—wilderness ecological systems are substantially free from the effects of modern civilization
- undeveloped—wilderness retains its primeval character and influence, and is essentially without permanent improvement or modern human occupation
- solitude or primitive and unconfined recreation—wilderness provides outstanding opportunities for visitors to be alone or remote from signs of society, to be self-reliant, to be free from the constraints of culture, to experience personal challenge, self-discovery, and physical and mental inspiration

The following indicators have been identified as being appropriate and feasible to monitor wilderness character in the Gaylord Nelson Wilderness. These indicators may be replaced and/or additional indicators may be identified if better ways are found to measure changes in wilderness character, if the indicators prove not to be sufficiently sensitive to measuring changes, or if the indicators prove not to be cost-effective to check regularly. Some of these indicators are already monitored by park staff and/or are monitored to satisfy Government Performance and Results Act (GPRA) requirements. For more information on these indicators see the Interagency Wilderness Character Monitoring Team (2008), Landres et al (2009), and NPS (2007). If monitoring shows a trend of downward quality, indicating degradation of wilderness character, then park managers would take appropriate action to address the impacts and

restore the character of the Gaylord Nelson Wilderness.

### **Organization**

All Apostle Islands National Lakeshore management divisions will continue to be involved in wilderness management. As directed by NPS Director's Order 41, all positions having significant wilderness responsibilities will be supported by position descriptions that detail these responsibilities.

The park's backcountry management team will continue to facilitate the review of projects and management actions proposed within the wilderness and associated analyses (e.g., minimum requirement analysis). The backcountry management team will continue to include representatives of the interpretation and education, protection, planning and resource management, and facility management divisions. Periodic meetings will continue to be held to evaluate

proposals, provide mitigation when necessary, and make recommendations to the superintendent.

The park's chief of planning and resource management is designated as the park's wilderness coordinator. This is a collateral duty of the chief of planning and resource management. The chief of planning and resource management has direct responsibility for the development, coordination, communication, implementation, and accountability for the park's wilderness program. This individual also serves as a liaison to regional and national wilderness programs.

Wilderness training will continue to be a priority for park staff with significant work responsibilities within the wilderness area, managing resources, or working with the park's wilderness visitors.

**Table 4: Wilderness Character Indicators to be Monitored in the Gaylord Nelson Wilderness**

<b>Wilderness Character Quality</b>	<b>Indicator</b>
Untrammeled Quality	Number of actions taken or authorized by park staff to manage plants, animals, pathogens, soil, water, or fire in the wilderness
Natural Quality	Number of indigenous species that are listed as threatened, endangered, sensitive, or of concern
	Total acres of the wilderness where nonnative vegetation is present and not considered contained*
	Extent and magnitude of change in water quality
Undeveloped Quality	Extent of wilderness acreage affected by development that does not support wilderness uses, such as homes/cabins, temporary structures, and utility line corridors*
	Type and amount of administrative and nonemergency use of motor vehicles, motorized equipment, or mechanical transport*
	Occurrences of noncompliant uses, including unauthorized use of motor vehicles, motorized equipment, or mechanical transport*
Solitude or Primitive and Unconfined Recreation Quality	Type and extent of management restrictions (e.g., requiring permits for wilderness visits, area closures, prohibitions or limited use of campfires)

\*Indicators monitored to satisfy requirements of the Government Performance and Results Act.