

**FINDING OF NO SIGNIFICANT IMPACT AND DECISION FOR THE
MANAGEMENT OF CULTURAL RESOURCES ON LIGHTHOUSE ISLAND,
HURON NATIONAL WILDLIFE REFUGE**

**HURON NATIONAL WILDLIFE REFUGE
SENEY, MICHIGAN**

The U.S. Fish and Wildlife Service prepared an Environmental Assessment to analyze alternatives regarding cultural resources management direction for Lighthouse Island on Huron National Wildlife Refuge in order to meet the cultural resource goals of the refuge outlined in the Great Lakes Islands National Wildlife Refuges Comprehensive Conservation Plan. The Environmental Assessment provided a decision-making framework that

- a) explored a reasonable range of alternatives to meet project objectives;
- b) examined the environmental consequences that each management alternative could have on the quality of the physical, biologic and human environment, as required by the National Environmental Policy Act of 1969; and
- c) identified mitigation measures to lessen the degree or extent of these impacts.

The effects of four alternatives for the future management of cultural resources on Lighthouse Island Huron National Wildlife Refuge were evaluated in this Environmental Assessment, which is incorporated as part of this finding of no significant impact.

Selected Action

Alternative D—Preferred Action Alternative:

Under the preferred action alternative, the Cultural Resources Management Plan developed for Lighthouse Island (included as Appendix B to the Environmental Assessment) will be implemented. This Plan developed criteria for determining the treatment of each historic structure on Lighthouse Island. The plan gives the historical context of the overall Light Station, the relevance to the National Historic

Preservation Act and the suggested disposition of each structure. The plan takes into consideration the current state of each structure, conditions that affect the structures, visitor use, partner interest and relevant laws and policies. Under this alternative, the U.S. Fish and Wildlife Service proposes to preserve, the Fog Signal Building, Flag Pole, Radio Tower, Tramway/Turntable, the nonhazardous utility infrastructure, Pathway, Dock, Lighthouse, Privy, Assistant Keepers Quarters and the Oil House. The boathouse will undergo modified rehabilitation to keep some of its original elements, while also providing opportunities for critical signage and shelter after being stabilized in the short-term for safety. The U.S. Coast Guard Barracks, Fuel Tank, Water Pump, and other utility structures posing safety concerns will be removed.

Implementation of this alternative is the responsibility of the Huron National Wildlife Refuge staff and is contingent upon completing a Memorandum of Agreement (formal agreement) with consulting parties as outlined in Section 8.2: Rehabilitation Treatment of Modified Historic Property of the Cultural Resources Management Plan to mitigate adverse effects. The Cultural Resources Management Plan is a 15 to 20 year management plan and is tied to future actions related to preservation of cultural resources, future environmental education and interpretation planning and wilderness stewardship.

This alternative was selected over the other alternatives because it best meets the purpose and need as described in the environmental assessment as it optimizes the balance needed to meet refuge purposes, National Historic Preservation Act and Wilderness Act requirements. Under this alternative, there is minimal impact to the physical and biological resources on Lighthouse Island, which is one of eight islands that make up the refuge and the focus of the plan. Adverse effects to cultural resources are expected to occur with removal of the barracks building and modified rehabilitation of the boathouse, however they will be mitigated through a memorandum of agreement as required by the National Historic Preservation Act. The cultural resources of the island are a characteristic of the Huron Wilderness. Under this alternative, the refuge is able to best maintain the character of this wilderness in the long run even though there will be some short term impacts to wilderness character of solitude through actions for maintenance. Additionally, this alternative is achievable given staff time and resources with the help of partners as to be determined in the memorandum of agreement.

Other Alternatives Considered and Analyzed

Alternative A—[No Action Alternative]

Actions to stabilize and mothball the historical structures would remain the same as currently being applied to the Lighthouse Island cultural resources. These actions are meant to prevent impacts from weather and vandalism. Refuge management and resource needs would remain about the same as currently being applied. The structures would continue to slowly be mothballed as funding and staff allows reducing adverse effects to cultural resources. Wilderness character would not improve or be negatively impacted as the cultural resources would still be in place. The visitor experience would remain largely the same; however, there may be safety concerns over the long term depending on the ability of staff to address degrading buildings and infrastructure. There would be negligible impacts to wildlife and vegetation as impacts are limited to temporary disturbance. This alternative would result in negligible impacts on costs, however would result in a minor negative impact to the overall benefits. Overall, there would be negligible impact to the human environment under this alternative. This alternative was not selected as it does not fulfill meeting the refuge purpose as described in the Comprehensive Conservation Plan.

Alternative B—Preserve All Action Alternative

Under this alternative, all buildings would be preserved in place on Lighthouse Island. Preservation is defined as the act or process of applying measures necessary to sustain the existing form, integrity and materials of an historic property. No extensive replacement or new construction would take place on buildings, and instead, work would focus on ongoing maintenance and repair of historic buildings. The boathouse would undergo modified rehabilitation as described in the Condition Assessment (Appendix D of the Environmental Assessment). Actions to preserve all historic structures in place would require a substantial increase in refuge management and operations. Pursuant to the Wilderness Act of 1964, all wilderness characteristics (undeveloped, natural, untrammeled, solitude or primitive and unconfined recreation, and “other features of value”) are supposed to be equal in consideration when evaluating alternatives for action in wilderness. Under this alternative emphasis is put on the “other features of value” characteristic while other values such as naturalness are discounted. Although this

is not a violation of the Wilderness Act, it goes against the intention of preserving all the characteristics of wilderness. Increased maintenance could have minor negative impacts to wildlife due to more increase in disturbance, however there is a minor positive impact to cost benefits. There would be no potential to improve the natural status of the northwestern side of the island; however, there would likely be negligible impacts to vegetation and habitat under this alternative. There would be no adverse effects on cultural resources under this alternative. This alternative also meets the purpose and needs of the Service as described above, because it would provide for no adverse effects to cultural resources and meet other legal requirements. However this alternative was not selected because, it does not balance the refuge purpose or preserve wilderness character in a balanced approach. Additionally, it will take more time, resources and staff to accomplish this alternative than what is available currently or in the foreseeable future.

Alternative C—Previously preferred alternative

Under this alternative, the Service would preserve the Privy, Oil House, Lighthouse, Assistant Keepers Quarters, Dock and Pathway while removing the Boathouse, Barracks, Fog Signal Building and all other Site Features. Site Features include the Tramway, Turntable, fuel storage tanks, septic pump system, flagpole, radio tower, in-ground concrete vaults, and utility poles and other electrical infrastructure. In the case where buildings or other site features are being removed, historical and cultural significance of these resources would be preserved in an alternative format, such as, but not limited to documentation through narrative and photography and/or interpretation through signage.

This alternative would improve wilderness character in a more balanced approach, provide a safe visitor experience and reduce refuge management needs. Selective removal of structures and infrastructure would enhance the ability to preserve the remaining buildings appropriately, enhance wilderness character, and heighten visitor and staff experience and safety. The lighthouse station would be preserved on the eastern side of the island while the northwestern part of the island would be restored to a more natural state promoting a more balanced experience of the other features of value, solitude, naturalness, and undeveloped characteristics of the wilderness on this island. The part of the island where buildings are being removed would be allowed to 're-wild' and return to a natural habitat type except for the concrete foundation areas. This would likely result in a small benefit for

wildlife and provide a larger area of boreal forest on the island in the long-term. After removal of buildings, staff would be better able to manage existing cultural resources on the southwestern part of the island, as the cultural resources would be concentrated in one area.

This alternative meets the purpose and need of this proposed action as it optimizes the balance needed to meet refuge purposes, National Historic Preservation Act and Wilderness requirements. Additionally, this alternative is achievable given staff time and resources. However, given new information provided by experts during the public comment period and after consultation with the state historic preservation office it was determined that this alternative does not best meet the need to manage cultural resources. The fog signal building and the tramway/turntable should be preserved in place as they are some of the last remaining physical examples of these cultural resources in Lake Superior. Although wilderness characteristics are more balanced on the island with regards to this alternative, looking at the full scope of the Huron Wilderness there are six other islands that feature the naturalness quality and provide quality habitat. Even though the other islands are not open for the public to find solitude visitors to the island can experience the naturalness quality from Lighthouse Island by viewing the other islands and the vastness of Lake Superior. Furthermore, considering the costs and benefits of this alternative, overall the gains provided from a cost savings perspective are outweighed by the potential negative overall benefits.

Summary of Effects of the Selected Action

Measures to mitigate and/or minimize adverse effects have been incorporated into the selected action. These measures include:

- Monitoring of visitor use as part of wilderness character monitoring and putting a permit system in place to mitigate potential impacts if visitation increased to significant levels. If this were to occur, a separate analysis would occur to set permitting thresholds.
- Activity related to preservation or demolition of cultural resources will occur between June through October during daylight hours to be outside the wildlife breeding and early development seasons. Timing of specific projects that could disrupt nesting birds or roosting bats would be delayed until after fledging or if monitoring indicates nests have failed or bats are gone.

- Building demolition or preservation activity will occur outside 660 feet from the known eagle nest. Daily utilization over consecutive multiple days for demolition work, transportation of preservation supplies or trail structural repairs will occur outside of nesting season (mid-August through October) unless monitoring indicates the eagle nest has failed and work can begin sooner.
- Any habitat that may be degraded during demolition or preservation activities will be restored to native habitat. It is not expected any habitat will be degraded during the activities described in the plan, as buildings are located in already disturbed areas; however, measures will be taken if they do occur.
- The refuge will follow recovery plan guidelines for the management of three federally threatened and endangered species, the Canada lynx, northern long-eared bat and red knot.
- To mitigate impacts to wilderness the refuge manager will use traditional tools when possible to preserve or demolish historic buildings or site features. A programmatic Minimum Requirement Analysis was completed prior to the Cultural Resources Management Plan that allows the use of non-traditional tools if necessary so long as the actions are within the scope of that Minimum Requirement Analysis. Any major projects proposing the use of prohibited tools will require additional analyses.
- In an effort to minimize potential safety hazards, the refuge may temporarily close to public use during preservation or demolition activities. Notice or information about any of these closures may be posted and available at the refuge office or online to mitigate conflicts.
- The State Historic Preservation Office and Advisory Council on Historic Preservation have been consulted to identify all possible adverse effects to cultural resources where there is an undertaking as defined by the National Historic Preservation Act. Specific mitigation measures to resolve these adverse effects will be defined during the development of the Memorandum of Agreement process to be completed after the completion of the Cultural Resources Management Plan.

While refuges, by their nature, are unique areas protected for conservation of fish, wildlife and habitat, the proposed action will not have a significant impact on refuge resources and uses for several reasons:

- There would be negligible impact to socioeconomics, water quality, air quality, geology and soils. There would also be no cumulative impacts to

climate change.

- The adverse direct and indirect effects of the proposed action on habitat and vegetation, wildlife and aquatic species, wilderness values and visitor use and experience are expected to be minor and short-term. The benefits to cultural resources that these efforts will accomplish far outweigh any of the short-term adverse impacts discussed in detail in the environmental assessment and summarized in this document;
- The proposed action will not result in significant adverse effects on public health or safety. Public health and safety will increase in the end as project is implemented and safety concerns are removed from the island.
- The proposed action requires adverse effects to cultural or historical resources be mitigated through a memorandum of agreement, reducing the significant impact;
- The action is not in an ecologically sensitive area;
- The action will not impact any threatened or endangered species; or any Federally-designated critical habitat;
- There is no scientific controversy over the impacts of this action and the impacts of the proposed action are relatively certain.
- The proposal is not expected to have any significant adverse effects on wetlands and floodplains, pursuant to Executive Orders 11990 and 11988 because there will be no impact to floodplains or wetlands as a result of this proposed action.
- The proposal will not have significant adverse effects on minority populations, pursuant to Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low- Income Populations because although minority and low-income communities reside within the two counties directly adjacent to the refuge, these communities will not be disproportionately affected by any impacts from this proposed action.

Public Review

The proposal has been thoroughly coordinated with all interested and/or affected parties. Parties contacted include:

- Keweenaw Bay Indian Community: Jeffery Loman, Tribal Counsel Refuge Liaison; Evelyn Ravindran, Natural Resources Director

- Huron Island Lighthouse Preservation Association: Burt Mason, President; Jeffery Loman Trustee
- Michigan State Historic Preservation Office: Bryan Lijewski, Architect
- U.S. Fish and Wildlife Service Staff: Nancy Roeper, National Wilderness Coordinator; Garrett Peterson, Intergovernmental Liaison; Jeanne Holler, Chief of Conservation Planning; Carl Millegan, Deputy Regional Refuge Chief; Suzanne Baird, Regional Refuge Chief
- Structural Engineer Company: Sanders & Czapski Associates, PLLC

On April 15, 2020, the Service released the Draft Environmental Assessment documents (including all separate appendices) and Draft Lighthouse Island, Huron National Wildlife Refuge Cultural Resources Management Plan for public review. Following the release of the Draft Environmental Assessment and Step-down Plan, the Service opened a 30-day public comment period that ended on May 15, 2020. After requests to extend the public comment period, the Service extended the public comment period and accepted comments until May 29, 2020. Members of the public were notified of the availability of the Draft Assessment and Draft Plan through a press release posted on the Service website at <https://www.fws.gov/refuge/Huron>. A press release was printed in the local paper, the Mining Gazette announcing the public comment period, April 28 and the extension May 18. Radio Results Network covered the story on 5/16/2020 and a second interview was completed on 5/22/2020 about the extension. During the comment period, 96 unique pieces of correspondence were received on the Draft Environmental Assessment and Draft Plan, including correspondence from a tribe, a state agency, three organizations, 86 individuals and two anonymous submissions. Correspondence reviewers derived 225 unique comments, 53 of which were substantive comments. Substantive comments were addressed in the final environmental assessment. Comments resulted in the development of a new alternative and determining the Pathway and Tramway/Turntable eligible for listing on the National Register of Historic Places after additional information was collected. No other site features, including the Dock, flagpole, and radio tower, are currently considered eligible for listing on the National Register of Historic Places. A full analysis and summary of comments can be found in Appendix C of the Environmental Assessment.

Finding of No Significant Impact

Based upon a review and evaluation of the information contained in the Environmental Assessment, as well as, other documents and actions of record affiliated with this proposal, the Service has determined that the proposal to implement the Cultural Resource Management Plan for Lighthouse Island on Huron National Wildlife Refuge (Alternative D) does not constitute a major Federal action significantly affecting the quality of the human environment under the meaning of section 102 (2) (c) of the National Environmental Policy Act of 1969 (as amended). As such, an environmental impact statement is not required.

Decision

The Service has decided to implement the Cultural Resources Management Plan as described in the selected alternative. Action will not begin until the Memorandum of Agreement has been finalized. The action is consistent with applicable laws and policies.

Regional Refuge Chief Signature and Date