United States Department of the Interior
National Park Service

Isle Royale National Park Fire Towers and Associated Structures and Sites
Name of Multiple Property Listing

Michigan
State

National Register of Historic Places Multiple Property Documentation Form

This form is used for documenting property groups relating to one or several historic contexts. See instructions in National Register Bulletin *How to Complete the Multiple Property Documentation Form* (formerly 16B). Complete each item by entering the requested information.

____X___ New Submission _____ Amended Submission

A. Name of Multiple Property Listing

Isle Royale National Park Fire Towers

B. Associated Historic Contexts

(Name each associated historic context, identifying theme, geographical area, and chronological period for each.)

Fire Management in National Park System Units of the Contiguous United States, 1886 to 1968
Fire Management at Isle Royale National Park, Michigan, 1936 to 1968

C. Form Prepared by:

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date: March 1, 2020

D. Certification

As the designated authority under the National Historic Preservation Act of 1966, as amended, I hereby certify that this documentation form meets the National Register documentation standards and sets forth requirements for the listing of related properties consistent with the National Register criteria. This submission meets the procedural and professional requirements set forth in 36 CFR 60 and the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation.

TURKIYA LOWE Digitally signed by TURKIYA LOWE Date: 2020.11.25 12:53:17 -05'00'

Signature of certifying official

Acting FPO
Title

11-25-2020
Date

National Park Service
State or Federal Agency or Tribal government

United States Department of the Interior
National Park Service

Isle Royale National Park Fire Towers and Associated Structures and Sites — Michigan
Name of Multiple Property Listing — State

I hereby certify that this multiple property documentation form has been approved by the National Register as a basis for evaluating related properties for listing in the National Register.

James Gabbert — 1/4/2021
Signature of the Keeper — Date of Action

Table of Contents for Written Narrative

Create a Table of Contents and list the page numbers for each of these sections in the space below.
Provide narrative explanations for each of these sections on continuation sheets. In the header of each section, cite the letter, page number, and name of the multiple property listing. Refer to *How to Complete the Multiple Property Documentation Form* for additional guidance.

E. Statement of Historic Contexts

(If more than one historic context is documented, present them in sequential order.)

Introduction:

The **historic context** for the Isle Royale National Park fire towers and their associated structures and sites is the development of fire management strategies within the National Park Service (NPS) as a whole, which guided those at Isle Royale National Park in particular. These management strategies changed over time, and the changes that were made are reflected in the construction of the first fire lookout towers on the island, construction later of new and replacement towers, and the eventual abandonment of the towers as fire management tools. After they were no longer used for fire management, the towers served other purposes, which is one reason they still stand today.

The national strategy for fire management, total suppression, began at Yellowstone National Park in 1886 under the leadership of the U.S. Army. Under this strategy, the U.S. Army endeavored to extinguish any fires it detected in the park, whether natural or man-made. No detected fires were allowed to burn themselves out. In 1911, passage of the Weeks Act authorized and, importantly, funded U.S. Forest Service Rangers to assist with fighting fires on federal, state, or private forest lands bordering any federal forest regardless of the place of origin of the fire.[1] As a result, the U.S. Forest Service (USFS) assumed the lead among government agencies in the development of fire management strategies in national forests. Like the Army, USFS mandated total suppression, which informed the early fire management protocols of NPS at Isle Royale. The earliest NPS efforts at such management were made following the extensive Greenstone Ridge Fire of 1936 in the newly designated Isle Royale National Park. Therefore, the period of historic significance for Isle Royale Fire Towers is 1936, when the Greenstone Ridge fire prompted construction of the first fire lookout towers, to 1968, when NPS officially adopted its own fire management plan, separate from that of USFS, and mandated allowing some fires to burn themselves out instead of vigorously suppressing all fires in its parks. This move put NPS in the lead among government agencies for scientific fire management on federal government lands, and USFS followed suit. The use of the towers for fire management diminished after 1968 and eventually was abandoned, but the towers continued to be used for other purposes such as backcountry ranger stations or temporary housing for trail crews until the 1980s.[2] In October 1976, Isle Royale was officially declared a Wilderness Area. By early 1984, a plan had been assembled to remove all three fire towers along with four patrol towers and a radio tower located in the designated wilderness area. The work was planned for the 1984 through 1986 seasons.[3] Ultimately, this plan was abandoned, and the fire lookout towers on Isle Royale continue to this day to attest to the evolution of fire management strategies within NPS broadly and their impact on strategies at Isle Royale in particular.

A fire lookout is a structure installed for the purpose of keeping watch to detect fires in a specific area. Fire lookouts consist of an enclosure, which may be either partly or completely enclosed, usually with a roof for weather protection for the observer. This enclosure is called the cab. In general, fire lookouts are situated at a high point of the area to be monitored, but they may also be raised up on a tower-like structure to afford a better view from a lower elevation. Fire lookouts raised on this type of structure are called fire lookout towers or, simply, fire towers. Early fire tower cabs were only about 7'x7' and did not provide accommodations for overnight stays. The observer walked to and from the fire tower daily from his or her station to conduct fire observation duties. In general, fire towers are found at the higher elevations of forested areas or other areas where natural or man-made fires are anticipated. Due to the size of Western parks, fire towers were often in very remote areas, which led to the development of a larger cab that could accommodate overnight or longer stays by the fire observer. In smaller

[1] Gerald Williams, PhD. *The USDA Forest Service – The First Century.* (USDA Forest Service, Office of Communication, Washington, D.C.) Revised 2005. Reviewed online at fs/usda.gov/sites/default/files/media/2015/06, April 2020, 28.

[2] Timothy Cochrane, former Isle Royale backcountry ranger and early park historian, in emails to Isle Royale National Park Cultural Resource Manager Seth DePasqual, October 3-4, 2019. Forwarded by DePasqual to author October 3-4, 2019.

[3] Lucas Westcott, *A Legislative and Administrative History of Federally Designated Wilderness at Isle Royale National Park.* Technical Report 2013-01 (Isle Royale Institute, Michigan Technological University, Houghton, Michigan, 2013), 36.

parks, the earlier, smaller design, which required daily trips to and from the observation tower, continued to be used.

Fire Management Strategies of the National Park Service, 1886 to 1968

This history of fire management in national parks is mainly derived from Hal K. Rothman's *A Test of Adversity and Strength: Wildland Fire in the National Park System* (2005), a significant contribution to, and thorough exploration of, the history of fire management on government-owned lands. Supplementing Rothman's work, Lucas Westcott's *A Legislative and Administrative History of Federally Designated Wilderness at Isle Royale National Park* (2013) and Philip V. Scarpino's *Cultural Resources on Isle Royale National Park: An Historic Context* (2010) provided insight into how federal legislation and NPS policies specifically impacted development and management of the fire towers in Isle Royale National Park.

In 1872, Yellowstone National Park was established as the first national park in the nation. The nation began paying attention to fires in the park, either deliberately set or ignited by lightning strikes, when, in 1886, Secretary of the Interior Lucius Q. C. Lamar, reacting to a cut in funding for Yellowstone National Park that made hiring necessary park staff impossible, requested federal troops under a civil appropriations act approved by Congress on March 3,1883, which authorized the War Department to provide troops for national park protection if the Secretary of Interior requested them.[4] As a result, Captain Moses Harris with a troop of fifty men were deployed to Yellowstone. They arrived on August 20, 1886 and made camp at Mammoth Hot Springs in the park. They spent the rest of the summer putting out as many as sixty fires, thereby committing the federal government for the first time to systematically suppressing fires on federal lands using federal funds.[5] Thereafter, until the late 1960s, the military strategy for fire management dominated in national parks and forests. The strategy was total suppression, which meant that the government used its resources to surveil the lands in its care to detect fires, either natural or man-made, and then put those fires out.[6]

The U.S. Army remained in charge of fire suppression in national parks, and, indeed, in charge of national parks in general, until 1914, when it requested to be relieved of that duty because the impending outbreak of World War I and a military adventure into Mexico occupied its attention, financial resources, and manpower.[7] By that time, the U.S. Forest Service had been established as an agency under the Department of Agriculture and assumed control of all national forests in 1905. It "took on the responsibility of creating professional standards for firefighting, including having more

4 Hal K. Rothman, *A Test of Adversity and Strength: Wildland Fire in the National Park System* (National Park Service, U.S. Department of Interior, 2005), 8-9.
5 Rothman, *A Test of Adversity and Strength,* 9.
6 Rothman, *A Test of Adversity and Strength,* 24, 29.
7 Rothman, *A Test of Adversity and Strength,* 31.

rangers and hiring local people to help put out fires."[8] While the Army managed fire-fighting in national parks, USFS managed it in national forests and surrounding areas, which sometimes included national parks. By the time NPS was established in 1916, USFS's fire management strategy, which followed that of its predecessor, the U.S. Army, was firmly entrenched. Fire suppression, combined with a public education program and rigorous patrol of areas heavily used by the public, all of which assumed sufficient personnel and funding resources, was the paradigm of the era for fire management on public lands.[9] The infrastructure created by the Army, including trails, roads, and lookouts, as well as establishment of fire brigades and funding of firefighting, was crucial for maintaining this total suppression strategy.[10]

The fire season of 1910, however, illustrated some of the drawbacks of the vigorous fire suppression policy, namely, the cost in personnel and infrastructure during an unusually dry period, when fires were both more dangerous and more frequent. Years of ruthless fire suppression had allowed leaves, needles, twigs, branches, and dead and downed trees to accumulate on the forest floors, and small brush, which would normally have been reduced by periodic natural wildfires, had sprung up between the larger trees. All this material was fuel for the fires that came after a long, dry spell in the West.[11] The U.S. Forest Service, although unable to completely suppress all fires that year, came into its own as the premier fire management agency in national forests, and NPS, established six years later, followed its lead in the management of fires in national parks for the next fifty years.[12]

A fire at Glacier National Park in 1921 intensified the pursuit of total fire suppression by NPS, but also highlighted the difficulties of this agenda. By 1922, fire lookouts had been established there as well as fire patrol trails and a cross-park telephone line for fire communications.[13] The National Park Service recognized the need for a systematic, system-wide approach to firefighting and hired John D. Coffman as the Fire Control Expert for NPS. Coffman systematized the USFS firefighting model, which NPS had been employing in principle anyway, albeit somewhat randomly, into NPS fire management protocols.[14] The National Park Service began requesting funds for additional personnel for fire patrols and firefighting, especially after bad fire seasons. Fire seasons, especially bad fire seasons, took a terrible toll on park budgets, and parks were annually requesting additional funds from Congress to mitigate the damage to their budgets caused from the cost of fighting fires.[15]

8 Williams, *The USDA Forest Service – The First Century* 32
9 Rothman, *A Test of Adversity and Strength,* 10.
10 Rothman, *A Test of Adversity and Strength*, 29-30.
11 Rothman, *A Test of Adversity and Strength*, 45.
12 Rothman, *A Test of Adversity and Strength*, 29.
13 Rothman, *A Test of Adversity and Strength*, 40.
14 Rothman, *A Test of Adversity and Strength*, 48-49.
15 Rothman, *A Test of Adversity and Strength*, 38, 40-41.

In 1933, the New Deal finally provided NPS with sufficient resources in funds and manpower to implement a fire management strategy that extended to all units of the National Park System. The Civilian Conservation Corps (CCC) provided the manpower, and the federal government provided the funds in a fusion of efforts to relieve the economic distress that afflicted the United States throughout the decade.[16] In 1935, a contingent of CCC workers arrived at Isle Royale and began working to provide the infrastructure necessary for the new national park on the island, authorized in early 1931.[17] The CCC men were there in 1936 to help with fighting the extensive Greenstone Ridge Fire that burned about one-fifth of the entire island. In 1937 and 1938, they helped to clean up the damage caused by the fire.[18] The CCC men built the first two fire lookout towers in 1939, one at Turkey Ridge, not part of this nomination, and one at Mount Ojibway, which is discussed in the individual properties nominated under this MDPF (see Figures. 1, 2, and 3).

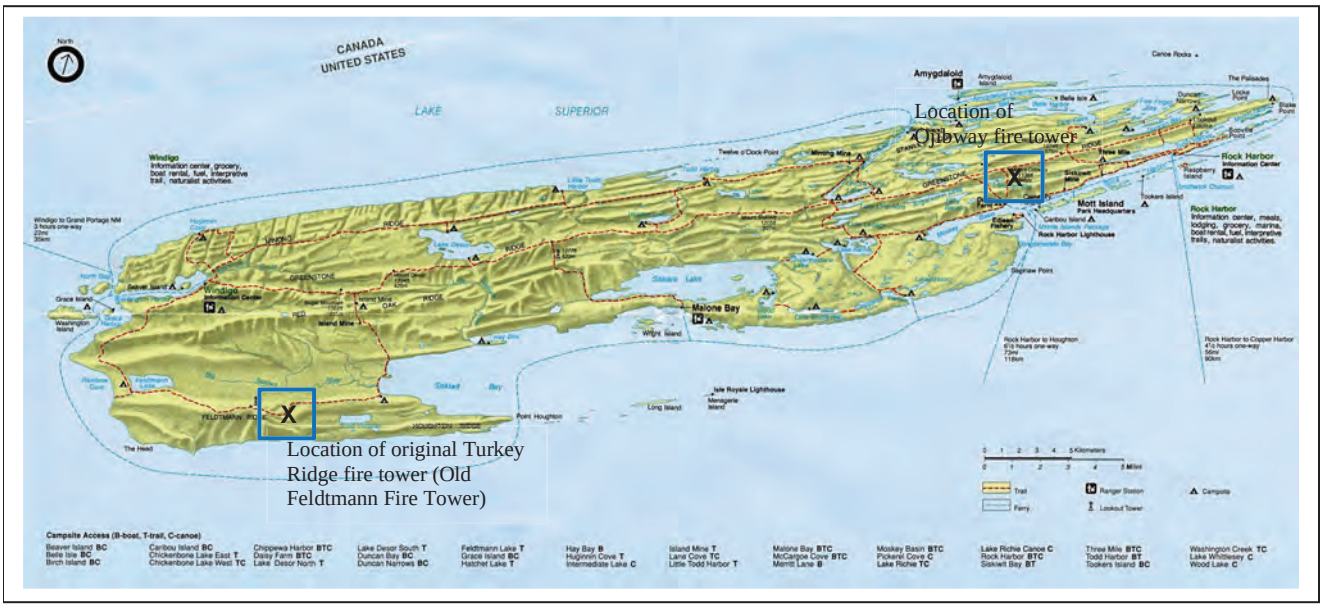

Figure 1: Locations of original fire towers in Isle Royale National Park. Map courtesy of Isle Royale National Park.

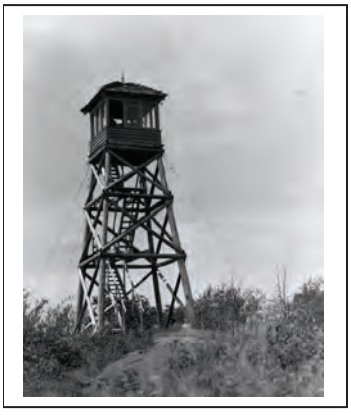

Figure 2: Original timber fire tower at Turkey Ridge (called old Feldtmann fire tower), date unknown. Photo from National Visual Inventory Card Collection, courtesy of Isle Royale National Park archives held at Keweenaw National Historical Park, Calumet,MI.

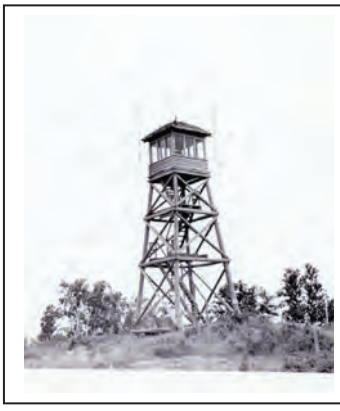

Figure 3: Original timber fire tower at Mt. Ojibway, 1951. Photo from National Visual Inventory Card Collection, courtesy of Isle Royale National Park archives, held at Keweenaw National Historical Park, Calumet, MI..

16 Rothman, *A Test of Adversity and Strength*, 53-55.
17 Philip V. Scarpino, *Cultural Resources on Isle Royale National Park: An Historic Context* (Indiana University/Purdue University, Indianapolis, 2010), 70.
18 Scarpino, *Cultural Resources on Isle Royale National Park*, 16.

For locating fires in national parks and forests, fire lookouts were essential. These structures were placed at strategic locations in fire-prone areas and used to shelter an observer whose duty it was to keep watch over the area in order to detect and report fire. The U.S. Forest Service designed several such structures over the years, and NPS, following the lead of USFS, adopted and site-adapted those designs. In the beginning, the fire lookout consisted simply of an enclosure about 7'x7', usually with a roof covering for weather protection. The observer walked to these structures daily to begin duty. Some of the fire lookout cabs were constructed on the ground, on promontories which afforded an unobstructed view of the surrounding area (see Figures 4 and 5)

Figure 4: Suntop Fire Lookout Tower at Mt. Ranier National Park, WA. Photo by Ian McRae. From website: visitranier.com.

Figure 5: Jones Point Fire Lookout Tower, Groveland Ranger District, Stanislaus National Forest, CA, about 1954. From website: fs.usda.gov/wps/portal/fsinternet.

However, where this was not possible, the cabs were raised on bases of varying heights and materials to improve the observation coverage. Cabs raised on such scaffold-like structures came to be known as fire lookout towers, or, simply, fire towers. In remote areas of the larger, Western national forests and parks, the fire tower cabs were larger to accommodate overnight stays by the observer. Such enlarged designs also included a balcony around the cab for easier access and observation (see Figures 6 and 7).

Figure 6: Balsam Lake Mountain Fire Tower, NY, built in 1930. Photo from Mother Nature Network at mnn.com/earth-matters/wilderness-

Figure 7: Cinnamon Butte Fire Lookout Tower in Umpqua National Forest, OR. Photo from Mother Nature Network at mnn.com/earth-matters/wilderness

Fire Management at Isle Royale National Park, Michigan, 1936 to 1968

When Isle Royale National Park built its first fire towers in 1939, they used the early 7'x7' USFS design on a 30' tall scaffold-type tower adapted from a Yellowstone National Park design (see Figure 8).

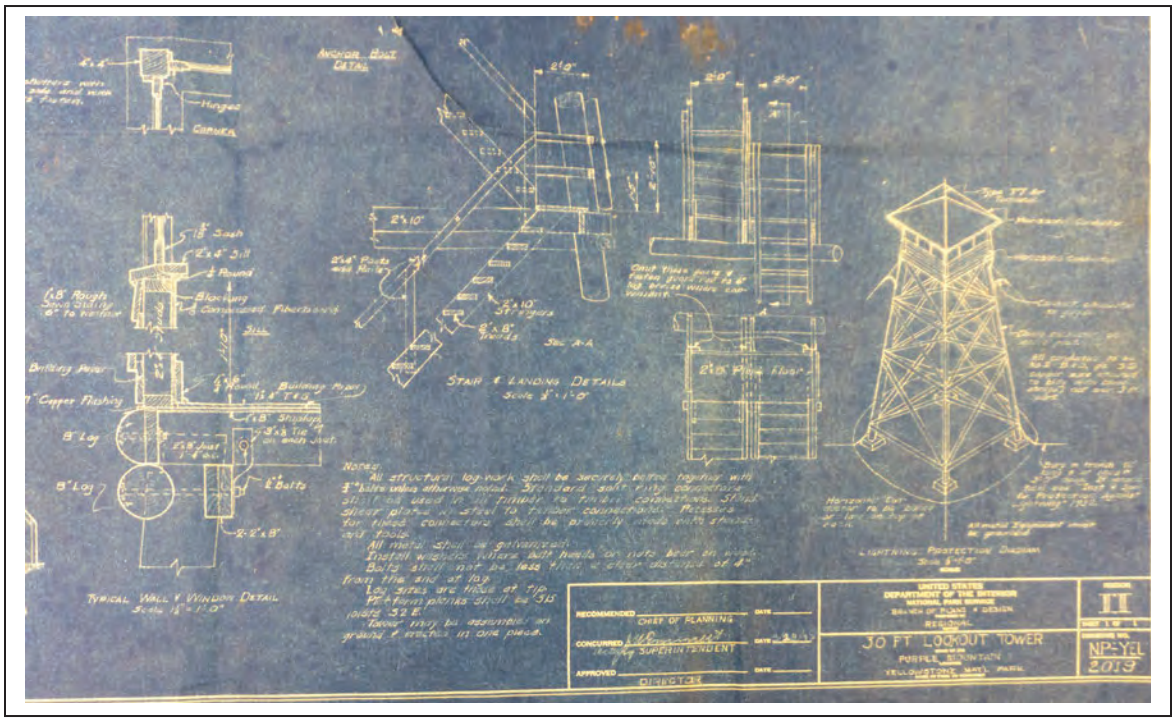

Figure 8: Detail scan of original Yellowstone National Park USFS design used for fire towers at Feldtmann and Ojibway, 1939. Courtesy of Isle Royale National Park, archives held at Keweenaw National Historical Park, Calumet, MI.

The structures were built by CCC crews of wood possibly cut from the forests on Isle Royale and placed at Turkey Ridge and at Mount Ojibway (see Figures 1 and 9).

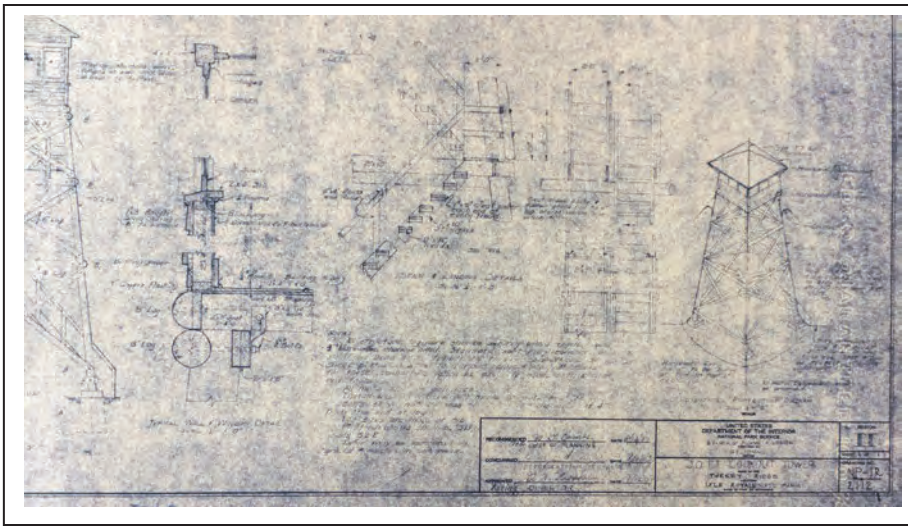

Figure 9: Detail scan of plan drawing for fire tower to be constructed at Turkey Ridge (Old Feldtmann). Note similarity to drawing for fire tower at Yellowstone National Park. Courtesy of Isle Royale National Park, archives held at Keweenaw National Historical Park, Calumet, MI.

Figure 10: Quarters at Feldtmann Ridge, 1952. Photo 50-261, from National Visual Inventory Card Collection, courtesy of Isle Royale National Park, archives held at Keweenaw National Historical Park, Calumet, MI.

These structures were not intended for overnight use, and it appears that small cabins were constructed in the general vicinity to house the ranger observers overnight (see Figure 10). Remains of these buildings have not been positively identified. By 1941, NPS began to plan for another fire lookout, this one a ground-based building on a promontory, at Ishpeming Point. This particular plan was never implemented at Isle Royale, but it is significant to note that the design, which was large enough to accommodate residence by the fire observer, followed those used in the larger, western parks rather than the smaller ones of the immediate region around Lake Superior. At this early date, Isle Royale National Park looked to the west for its fire observation structures.

By the mid-1950s, park personnel were of the opinion that the existing wood fire towers at Turkey Ridge, by then called the Feldtmann Fire Tower,[19] and Ojibway were in need of replacement due to their deteriorated condition.[20] The National Park Service began to look at designs for taller, steel fire towers with integral living quarters and a balcony like those found in the western parks. In 1956, when planning began for the celebration of NPS's fiftieth anniversary in 1966, funds became available for improvements at the park through the Mission 66 program.[21]

As a result of the Mission 66 program, NPS was able to build on Isle Royale a new steel fire tower with integral living quarters at Ishpeming Point in 1961 and also to replace in 1964 the two existing wood towers at Turkey Ridge and Ojibway with steel fire towers similar to that at Ishpeming. The original wood towers at Turkey Ridge and Ojibway were demolished in 1963 by NPS personnel. The new replacement tower on Feldtmann Ridge was built approximately one-half mile further southwest from the old fire tower located at Turkey Ridge.[22] A new trail from Siskiwit Bay, east of the old tower, to Feldtmann Lake on the west was planned, and the new fire tower was located along its route. To distinguish between the two, the fire tower at Turkey Ridge is designated Old Feldtmann Fire Tower,

[19] At some point between 1941 and the 1950s, the tower at Turkey Ridge came to be known as the Feldtmann Fire Tower. This document will use the designators Old Feldtmann Fire Tower and New Feldtmann Fire Tower to distinguish between the two.

[20] National Park Service Project Construction Program Proposal Form, Index No. B-51-2, executed by Chief Ranger Floyd Henderson on December 10, 1954, and approved by park Superintendent Robert F. Gibbs on January 1, 1955, for a new steel tower at Mount Ojibway references an earlier proposal form, B-51-1, indicating that the desire to replace the original wood structures originated before December 10, 1954. Earlier record not located. Located at Federal Records Center, Chicago, IL, Record Group #79, Box 9. Electronic file provided to author by Federal Records Center, Chicago, IL.

[21] Rothman, *A Test of Adversity and Strength*, 99.

[22] Gordon Mattila, *Isle Royale Towers and other island construction* (Atlantic Mine MI: Shenanigan Press), n.d., 3.

and the one on Feldtmann Ridge is called New Feldtmann Fire Tower in this document (see Figure 11). The Ojibway replacement tower was constructed in approximately the same location as that of the original tower. Both New Feldtmann Fire Tower and Ojibway Fire Tower were site-adapted from a USFS Region 7 design for a steel tower 41'-3" tall with an integral live-in cab surrounded by a balcony (see Figure 12). By 1965, Isle Royale National Park was poised to detect and suppress all fires on the island (see Figures 13, 14, and 15).

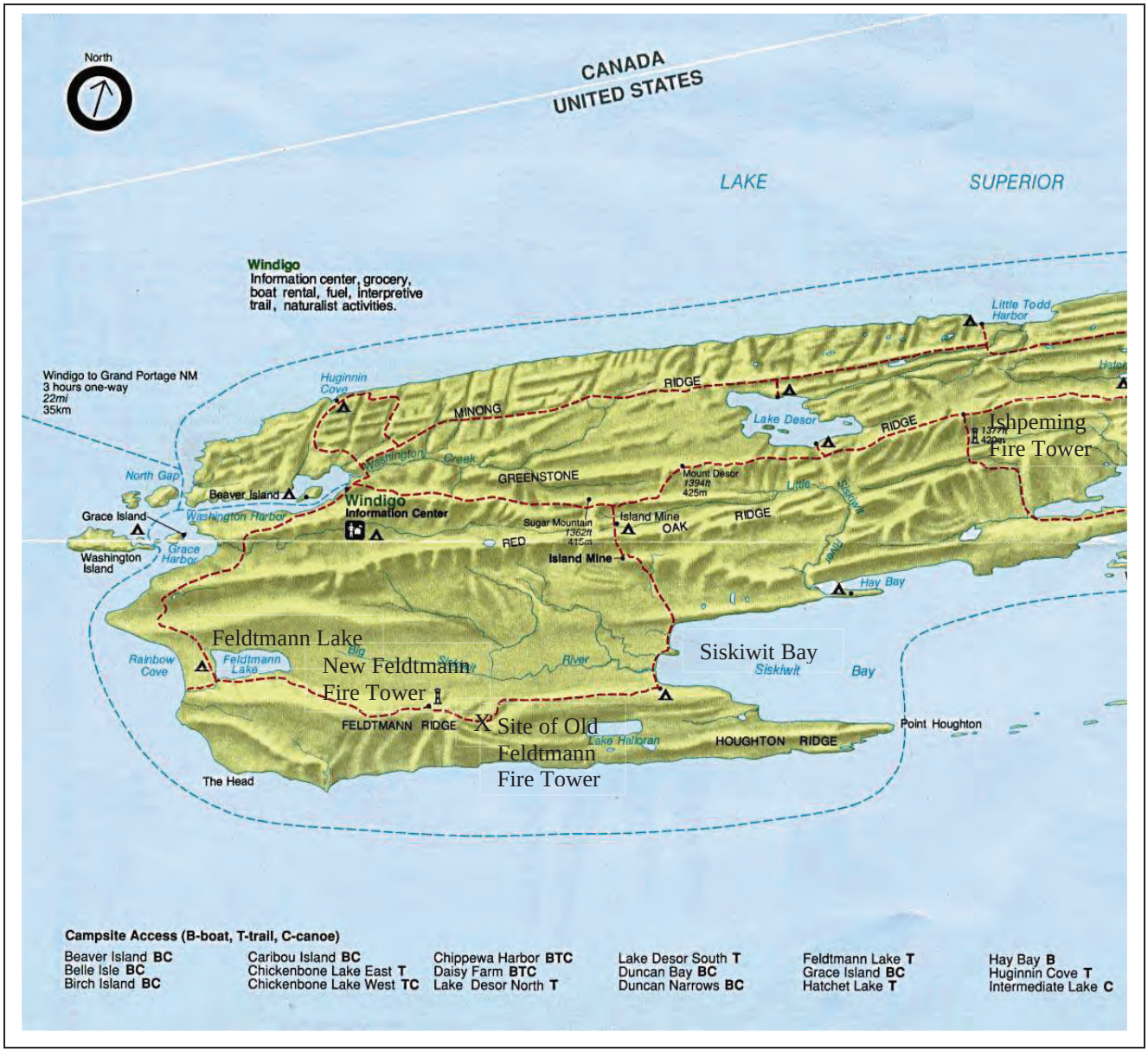

Figure 11: Locations of geographic features and new fire towers on west end of Isle Royale. Map courtesy of Isle Royale National Park.

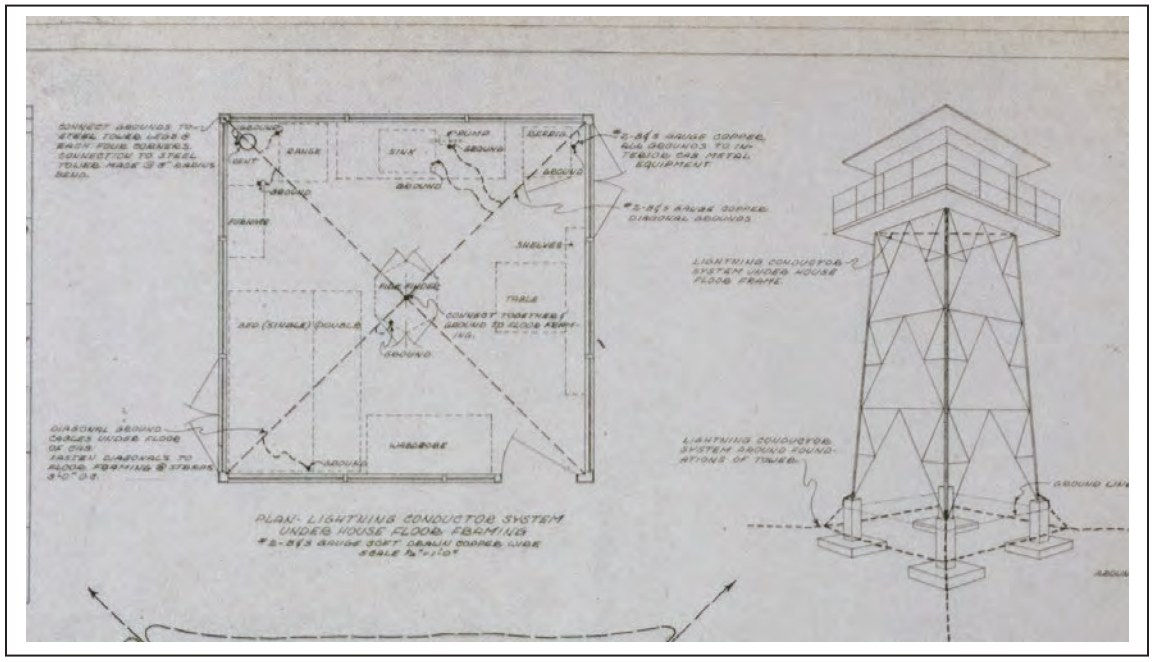

Figure 12: Detail from plan drawings for 1951 Standard Steel Lookout Tower Plan shows arrangement of living quarters for proposed new steel fire lookout towers at Isle Royale National Park. Scan courtesy of Isle Royale National Park from Isle Royale National Park archives held at Keweenaw National Historical Park, Calumet, MI

Figure 13: Ishpeming Fire Lookout Tower, 1962. Photo from National Visual Inventory Card Collection, courtesy of Isle Royale National Park, archives held at Keweenaw National Historical Park, Calumet, MI

Figure 14: Ojibway Fire Lookout Tower, 1965. Photo from National Visual Inventory Card Collection, courtesy of Isle Royale National Park, archives held at Keweenaw National Historical Park, Calumet, MI.

Figure 15: The only historic photograph of New Feldtmann Fire Lookout Tower located for this document, dated 1964. Photo from National Visual Inventory Card Collection, courtesy of Isle Royale National Park, archives held at Keweenaw National Historical Park, Calumet, MI.

Over this same period, however, NPS began to deviate from the total suppression model, especially as new national parks with different ecologies from those in the West became established. Critical to this change in policy was the establishment of Everglades National Park, which had been authorized in 1934 but was not established until 1947 due to the effects of the Great Depression and the prosecution of World War II. In this wet environment, unlike the drier areas of western parks, common practice was to let fires in the area burn themselves out, and observers noted that, soon after a fire, the burned area was full of new, green grass shoots, flowering herbs, fireweed shrubs, and vines.[23] It was believed by surrounding communities that the effect of fire in this different climate and environment was beneficial rather than harmful. This offered NPS an alternative view of fire management to the total suppression model of USFS.[24] The National Park Service first experimented with allowing fires to burn themselves out in the Everglades after three large fires in 1950 illustrated the inadequacies of the fire management program in that newly-established park.[25] In addition, a study conducted in 1956 by Daniel Beard, the first Superintendent of Everglades National Park, resulted in a memorandum to Regional Director Elbert Cox outlining the dangers to the significant resources of the swamp of allowing understory materials to accumulate. Accumulation was the product of NPS's fire management strategy of waiting for natural or manmade fires to strike and then suppressing them only where they were burning. The memorandum proposed the use of strategically set fires, called

23 Rothman, *A Test of Adversity and Strength*, 91.
24 Rothman, *A Test of Adversity and Strength*, 91.
25 Rothman, *A Test of Adversity and Strength*, 92.

"controlled burns" to remove dead and downed wood and grasses and promote the health of the understory of the wilderness areas. This memorandum became a fire management plan for the Everglades that eventually made its way to National Park Service Director Conrad Wirth. In October 1957, "Wirth approved the first controlled burning plan within the national park system in more than thirty years."[26] In April 1958, personnel at Everglades National Park set a fire in the park and "inaugurated the first long-term prescribed fire plan in the national park system."[27] These practices, allowing some fires to burn and using prescribed burns, were exported to other parks, even western parks, over the years. By 1968, both practices were advocated in *Administrative Policies for Natural Areas in the National Park System,* also known as "the Green Book," and this became standard throughout the National Park System. Fire detection was still critical, but fire suppression was no longer paramount.[28]

During the 1950s and into the 1960s, legislation to manage federal lands increased in response to public pressure as well as changes to the management environment of federal land managing agencies. This legislative activity included passage of the Wilderness Act in 1964.[29] The Wilderness Act mandated inventories of areas to be designated as wilderness areas along with formulation of management plans for those areas. These plans were required to be reviewed by Congress, with official approval to be confirmed through legislation.[30] The National Park Service struggled to match its proposed wilderness area management practices with the expectations and demands of Congress, sending several iterations of the plan for review. The first wilderness bill sent to Congress in 1966 was rejected with biting commentary, but the third and final bill, PL-94-567, was signed by President Richard M. Nixon designating the wilderness areas of Isle Royale, which included the majority of the island's land mass as well as some of the associated islands around it.[31]

In October 1976, Isle Royale was officially declared a Wilderness Area. The legislation designating Isle Royale as wilderness included the provision for prescribed burning. Although prescribed burning, an act of man that alters the natural surroundings, was conceded to be antithetical to the notion of a wilderness area unaltered by human intervention, the inclusion of prescribed burning as a specific management tool directed by the legislation was intended to preclude any future cease and desist orders should prescribed burning be considered necessary for good resource management by NPS personnel.[32] "Administrative use and maintenance of fire towers were not included in the bill, because it was provided for in Section 4 of the Wilderness Act, as interpreted by Secretarial Order 2920."[33] With this legislation and the assumption that the stewardship of the Isle Royale wilderness would

26 Rothman, *A Test of Adversity and Strength,* 94.
27 Rothman, *A Test of Adversity and Strength,* 94.
28 Rothman, *A Test of Adversity and Strength,* 120.
29 Rothman, *A Test of Adversity and Strength,* 120.
30 Westcott, *A Legislative and Administrative History of Federally Designated Wilderness at Isle Royale National Park,* 10.
31 Westcott, *A Legislative and Administrative History of Federally Designated Wilderness at Isle Royale National Park,* 17-27.
32 Westcott, *A Legislative and Administrative History of Federally Designated Wilderness at Isle Royale National Park,* 47.
33 Westcott, *A Legislative and Administrative History of Federally Designated Wilderness at Isle Royale National Park,* 48.

include prescribed burns to remove natural accumulations of fuel in order to inhibit the likelihood of dangerous fires such as the Greenstone Ridge fire in 1936, the need for fire lookout towers on the island waned. However, the fire towers continued to be used as backcountry ranger stations or temporary shelter for trail crews until the early 1980s.[34] During the 1970s, as budgets contracted, fewer seasonal backcountry rangers were employed at Isle Royale, which impacted occupancy at the towers. New Feldtmann Fire Tower was left unoccupied first. Ojibway Fire Tower, though not occupied, served as the radio repeater station for the island and experienced more traffic than the other two towers due to maintenance needs of the equipment during this period. In 1980, solar panels were added to Ojibway Fire Tower, along with a shed to house the batteries and other equipment associated with the solar energy conversion. Additionally, in the late 1980s, environmental air quality monitoring equipment was installed at Ojibway Fire Tower, increasing, for a while, its functional value. But fire lookout rangers no longer occupied any of the structures by 1980, and the use of the towers as residences gradually diminished. The last fire tower resident was likely backcountry ranger Janis Meldrum, who occupied Ishpeming Fire Tower in 1981.[35]

Fig. 15: Power line to Ojibway Fire Tower. Photo from National Visual Inventory Card Collection, courtesy of Isle Royale National Park, archives held at Keweenaw National Historical Park, Calumet, MI.

As part of the effort to include as much of the island as possible in the wilderness area, the overhead power line from Mott Island to Ojibway Fire Tower, installed by 1969, (see Fig. 15), was removed in 1982, making the corridor along which it passed part of the wilderness and increasing the size of the designated wilderness by 138 acres.[36] By early 1984, a plan had been assembled to remove all three fire towers along with four patrol towers and a radio tower located in the designated wilderness area. The work was planned for the 1984 through 1986 seasons.[37] The rationale for this was a change in wilderness management strategy rather than a change in fire management strategy. Resource Management Specialist Craig Axtell issued a draft *Backcountry Management Plan* for the park in 1985 which mandated that all wilderness management facilities be located outside of the wilderness zone. In Axtell's view, the wilderness at Isle Royale was relatively accessible to management tools from outside the zone, so tools such as the fire towers, radio tower, and patrol cabins located within the wilderness zone were unnecessary and should be removed because their presence conflicted with the intent of the Wilderness Act.[38] The Draft Environmental Impact Statement (EIS) for removing these

34 Timothy Cochrane to Seth DePasqual in email, October 3, 2019.
35 Timothy Cochrane to Seth DePasqual in email, October 4, 2019.
36 Westcott, *A Legislative and Administrative History of Federally Designated Wilderness at Isle Royale National Park*, 53.
37 Westcott, *A Legislative and Administrative History of Federally Designated Wilderness at Isle Royale National Park*, 36.
38 Westcott, *A Legislative and Administrative History of Federally Designated Wilderness at Isle Royale National Park*, 36.

structures concurred.[39] However, several factors intervened to prevent the removal of the fire towers, not the least of which was the prohibitive cost and lack of funding for the helicopters required to haul deconstructed tower materials off the island. Resource Management Specialist Craig Axtell left the park, the EIS was never finalized, and the draft *Backcountry Management Plan* was never finalized or implemented.[40]

In 1987, NPS added equipment to Ojibway Fire Tower, which already served as a radio repeater station for the island. Equipment mounted on the tower monitored air pollution on Isle Royale, and solar panels also mounted on the tower provided power to the devices. A shed to house electrical equipment for the solar panels was installed at the base of the tower. A wayside exhibit was installed on the exterior of this shed at Ojibway Fire Tower to interpret its new function.[41] Although no longer used to watch for fires, the fire lookout towers at Ishpeming and New Feldtmann continued to be employed as temporary shelter by rangers and trail crews as well as, apparently, by some backcountry campers from the mid-1970s until the present.

F. Associated Property Types

(Provide description, significance, and registration requirements.)

U.S. Forest Service "Standard Steel Lookout Towers – 30', 41'-3", 54', 67'-6", & 83'-1½" High With Living Quarters," designs revised December 1954.

Description: The historic property type for this nomination are two variations of USFS's "Standard Steel Lookout Tower…with Living Quarters" design, with tower support for the cab of varying heights as provided in the standard design. The differences between the two is very minimal and consist, generally, in the height of the tower and the material of the balcony floor and stair treads. Fire towers are situated on prominent ridges spaced along the length of the island with a view to affording coverage of the entire island for fire detection. The cab and balcony of each tower, from which the observer can monitor the surrounding wilderness for fire, is raised above the ground on a metal scaffold-type tower intended to clear the tree line and provide an unimpeded view. In general, this property type is built with pre-fabricated sections constructed of angle steel bolted together using gusset plates and attached to concrete pier foundations with embedded bolts. At the top of each tower is a pre-fabricated, live-in cab, approximately 14'x14', constructed of metal panels. Windows on all four sides allow the observer to easily see the wilderness in all directions. Each cab has a metal entrance door, a corrugated metal roof, and a wood plank floor covered with floor tiles or sheet flooring. A metal balcony on all four sides of each cab is reached by a metal stairway from the ground and accessed by a metal hatch in the floor of the balcony. All stair landings and balconies are

39 Westcott, *A Legislative and Administrative History of Federally Designated Wilderness at Isle Royale National Park*, 37.
40 Westcott, *A Legislative and Administrative History of Federally Designated Wilderness at Isle Royale National Park*, 37.
41 Westcott, *A Legislative and Administrative History of Federally Designated Wilderness at Isle Royale National Park*, 38.

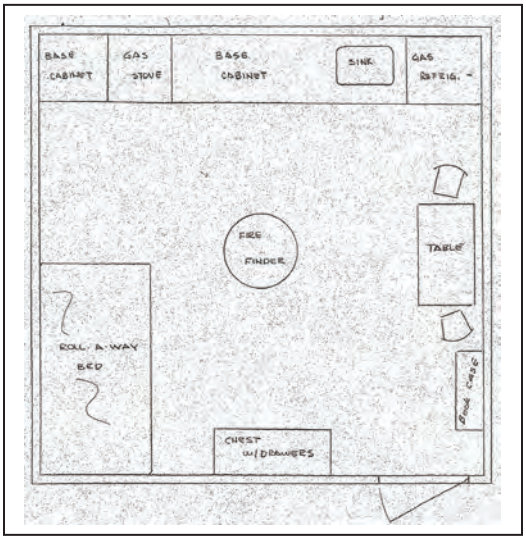

Fig. 16: Proposed layout of living space in new fire lookout tower cabs. Drawing by James Bowman, Park Engineer, in "Project Construction Proposal B-49-5, 1963." Image located in Record Group #79, Box 9, at Federal Records Center, Chicago, IL.

surrounded by fall protection consisting of round tube steel bolted together to form a railing, with chain link fencing installed along the railing and between the uprights. Stair railings are angle steel. All towers have radio repeater stations installed on the balcony. Other equipment installations vary by fire tower location and use. All towers are equipped with a metal water tank below the floor of the cab and a hand pump on the interior to provide water to the cab occupants. All towers also have a container installed on the balcony of each tower that appears to be part of the water management system for the cab, but it is unclear if it was used for potable water or for wastewater. Each cab contained a single metal bed, a small kitchen area with cabinet, sink, and gas-fired cooking stove, and a Fire Locator with support cabinet (see Fig. 16). Other furnishings within the cab vary with the fire tower location and use. This property type was erected on Isle Royale between 1959 and 1968.

Other Associated Structures: Outhouses.

Description: Due to the remote locations of the fire towers, outhouses were a necessary component of the fire lookout tower complex when the live-in cabs were in use. Therefore, outhouses installed during the Period of Significance are considered contributing structures for fire tower sites. Contributing outhouses are of prefabricated construction. They are approximately five feet by five feet square, with vertical reverse board-and-batten wooden walls, a translucent green plastic roof, and a single door. The top of each wall has a vent opening. Each outhouse shelters one metal stool. A stool lid may or may not be present, and its absence does not impact the integrity of the structure. The associated historic outhouse is considered part of the fire lookout tower property type.

Significance*:* To qualify for National Register of Historic Places listing, a property must be at least fifty years in age and possess historic significance. The National Register of Historic Places identifies several areas of potential significance, two of which, Criterion A and Criterion C, apply to the fire lookout towers at Isle Royale. Future research may reveal significance under Criterion D, an archeological site which has yielded, or may in the future yield, important information related to human history or prehistory, but investigation into this area of significance is not planned by the National Park Service and is beyond the scope of this documentation project.

To be significant under Criterion A, a property must be one that embodies some element of the broad patterns of our nation's history. When the U.S. Army was called to duty in Yellowstone National Park in 1886, it marked the first time that the federal government assumed responsibility for fire management in national parks, a responsibility that continues to the present. The construction of fire lookout towers were an integral part of that responsibility. The towers at Isle Royale National Park are the direct result of efforts of NPS to identify and suppress all fires in national parks, whether natural or deliberately set. This was the fire management strategy begun in 1886 by the U.S. Army at Yellowstone National Park.[42] The strategy was continued by NPS until approximately 1968, when the total suppression model was modified to allow some fires to burn themselves out.[43] That the towers are no longer used for fire spotting speaks to this change in federal fire management practices, when NPS took the lead among federal agencies, to manage wildfires in parks by monitoring and letting some burn themselves out, only suppressing those that threatened life and property. As important, budget constraints and changes in management practices, especially after Isle Royale was declared a Wilderness Area in 1976, reduced the use of the towers for detecting fires. The fire towers transitioned first to backcountry ranger stations in the 1970s and early 1980s but were gradually left unoccupied as the park continued to reduce the number of backcountry rangers it employed.[44]

To be significant under Criterion C, a property must embody the distinctive characteristics of a type, period, or method of construction. Fire lookout towers are a distinctive structure type, and, in the case of this particular design, can be considered a building type because it is designed as a permanent shelter for humans. Fire lookout towers were originally designed by USFS for use in national forests, and USFS designs were adopted, often without modification, by NPS to serve in national parks. This is the case with the fire towers at Isle Royale: they were constructed directly from USFS blueprints and specifications. The fire towers at Isle Royale are locally significant under Criterion C for their design, however, because, though a USFS Standard Steel Lookout Tower with Living Quarters design used in national forests nationwide, it is unusual in this part of the country, where a different and earlier USFS design without living quarters prevails.[45] This choice of design was a deliberate decision by National Park Service Region 5 Supervising Architect John B. Cabot, seconded by Superintendent of Isle Royale National Park John G. Lewis.[46] All three fire towers, which include a live-in cab and surrounding balcony, reflect a design used in the Western parks and national forests rather than that used in the northern Midwestern parks and forests surrounding the Great Lakes, which do not include a live-in cab or a balcony. This makes the three fire towers at Isle Royale National Park locally unique. For more information, including photographs, on the differences between the Isle Royale Fire Towers

42 Rothman, *A Test of Adversity and Strength*, 9.
43 Rothman, *A Test of Adversity and Strength*, 120.
44 Timothy Cochrane to Seth DePasqual in email, October 3, 2019.
45 See, for instance, Buck Hill Lookout at Pictured Rocks National Lakeshore in Alger, County, MI, reviewed by author September 8, 2019 at www nhlr.org/lookouts/us/mi.
46 John B. Cabot, Acting Chief, EODC to Superintendent John G. Lewis, in letter dated October 23, 1958; and John G. Lewis, Superintendent, to Acting Chief EODC John B. Cabot in letter dated August 13, 1958, located in Record Group 79, Box 9, Federal Records Center, Chicago, IL Electronic file provided by the Federal Records Center, Chicago, IL .

and those of other parks and national forests in the region surrounding the Great Lakes, see individual nominations. The associated historic outhouses are a necessary part of the property type.

In addition, the Isle Royale fire towers embody a specific method of construction intrinsic to prefabrication: the components, such as stairs, walls, and railings, were fabricated off-site, shipped to the site and bolted together on site. Constructed almost exclusively of metal, the towers embody the same method of construction, as well as fastening components, as other industrial structures such as metal bridges, scaffolds, and framing for office buildings. Unlike the earlier fire towers on the island, which were of timber construction more consistent with their rustic surroundings, these metal fire towers are unmistakably modern, man-made structures imposed on the encircling wilderness. This method of construction is consistent for fire towers nationally, whether or not the towers have live-in cabs.

For the purposes of the National Register of Historic Places, significant structures, buildings, objects, or sites must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. The specific criteria by which the Fire Towers at Isle Royale are evaluated are elaborated in the following paragraphs.

Registration Requirements: To qualify for listing within this multiple property context, a structure must be a fire tower erected within the boundaries of the Isle Royale National Park for the purpose of spotting fires on Isle Royale, or support structures and buildings such as outhouses or fire spotter residences for these fire towers. The property must have been constructed before 1968 and must also retain historic integrity of location, design, setting, materials, workmanship, feeling, and association. How the individual towers meet these criteria is discussed in the individual listings.

The three standing fire towers are in good condition, having been constructed of galvanized steel bolted together. There is some minor evidence of rust at some locations on the steel, particularly on horizontal surfaces. The interior finishes of the cabs are in fair condition. The ceiling coverings show evidence of leakage, and the floor coverings are cracking and delaminating. The three properties appear to all possess, in varying degrees, nearly all the following integrity criteria required for registration:

Location: Location is the place where the historic property was originally constructed and is a key component of integrity for listing in the National Register of Historic Places. Removing a structure from its original location eliminates the context within which the structure is understood, embodied in its surroundings. According to the National Park Service Bulletin, *How to Apply the National Register Criteria for Evaluation,* structures that have been moved from their original locations are not considered eligible for listing in the National Register of Historic Places except in special circumstances. These special circumstances are: the structure is part of a larger district that does qualify, the structure is significant primarily for its architectural value, or the structure is one most

importantly associated with an historic person or event. None of these special circumstances apply to the Fire Towers at Isle Royale. Therefore, to qualify for listing in the National Register of Historic Places, the fire tower must be in its original location. No fire tower moved from its original location may be registered within this multiple property context.

Design: Design is the form, plan, and style of the structure and reflects its historic function(s). Design includes the spatial arrangements of the components. The fire tower must retain its original design without material alternation. However, if materially altered during the Period of Significance, 1936 to 1968, the alternation may be historic in its own right, and the altered tower may still be listed. The property must be evaluated as it exists. The evaluation must not be based on planned or potential alterations.

Setting: Setting is the character of the physical environment in which the structure is located. Loss of setting is the reason most properties moved from their original locations are not eligible for the National Register of Historic Places. The physical surroundings of the fire towers should not have been significantly altered from the end of their Period of Significance, 1968. No buildings, structures, or features should have been constructed or installed in proximity to the fire towers after 1968. Installation of unpaved trails or of trail signs in proximity to a tower, however, will not disqualify a tower from listing. Because the fire towers generally rise above the surrounding vegetation and provide views across the island as well as to the shores across the expanse of Lake Superior, changes at the edges of the island and on the shore across the lake that can be seen from the fire tower balcony will also not disqualify the tower from listing.

Materials: Materials are the physical components used to construct the structure when combined according to the design. The materials of the fire towers must be the same as the original materials. They do not have to be the original materials, but, if replaced, they must have been replaced in kind. For instance, a broken glass window must have been replaced by another glass window, not with, for example, a plywood panel. If floor coverings have been replaced, they must be of the same materials as the original floor coverings. The date these replacements were made will not impact the integrity of the building if the replacements were made in kind. Materials replaced not in kind will negatively impact the historic integrity of the property.

Workmanship: Workmanship is the evidence of the labor, crafts, and skills employed in construction of the structure and its site. The workmanship of the fire tower must reflect that of its historic construction. The three Isle Royale towers are pre-fabricated steel structures bolted together on site by an erection crew. Therefore, the workmanship of the towers must be that of professional assemblers of pre-fabricated steel structures. Any additions or alterations to the towers must be of similar professional appearance.

Feeling: Feeling is the expression of an aesthetic or historic sense of the property at a particular period of time. For the Isle Royale Fire Towers, this is especially relevant to its setting, which provides the main components for the feeling of the property. The tower site should retain the feeling of isolation in a wilderness that it had in 1968, the end of the Period of Significance. New man-made buildings, structures, or features, except for unpaved trails and trail signs, within the functional site of the tower, may impact the integrity of feeling of the tower, but will not necessarily exclude the tower from listing. This should be determined on a case-by-case basis, depending on the placement and function of the new feature.

Association: Association is the direct link between an historic property and an historic event or person. The tower site should maintain its association with its historic significance. It must be identifiable as a fire tower constructed for the purpose of spotting fires on Isle Royale. Minor alterations or modifications, such as the introduction or removal of certain equipment or furnishings will generally not affect the eligibility of a property as long as those alterations or modifications do not significantly impact the ability to link the property with its historical use and historic significance.

G. Geographical Data

The geographical area is Isle Royale National Park on the island of Isle Royale, in the county of Keweenaw, state of Michigan. Boundaries of the three properties within this geographical area are described in the individual nominations accompanying this multiple-property documentation form.

H. Summary of Identification and Evaluation Methods

(Discuss the methods used in developing the multiple property listing.)

The National Park Service Midwest Regional Office identified three fire towers and one tower ruin with their associated sites and structures in Isle Royale National Park to be evaluated under this Multiple Property Documentation Form (MPDF). Under this MPDF, significant property themes were identified based on historical function. That is, the towers and their associated structures served the purposes of NPS in fire management on Isle Royale. This function also informed the theme of the historic context: the evolution of fire management in the National Park System in general and at Isle Royale National Park in particular. Available on-line documentation on fire lookout towers and federal fire management efforts was reviewed, as well as documentation specific to the park provided by the Midwest Regional Office of the National Park Service at Omaha, Nebraska, the Isle Royale National Park photographic archives, the Keweenaw National Historical Park archives, and the Federal Records Center in Chicago, Illinois. The reviewed documents pertinent to the fire towers consisted mainly of

engineering and architectural drawings of fire tower designs and photographs of construction and completion of the towers. Additionally, a published diary of the construction of the New Feldtmann Fire Tower and Ojibway Fire Tower from the 1964 construction and the project completion report for that same period were located and reviewed. Historical and current maps of the island were located for use in visually locating the properties.

A team of photographers with an architectural historian made a site visit to Isle Royale National Park to photograph and measure the three existing towers, the tower ruin of Old Feldtmann Fire Tower, the surrounding sites, and the associated small structures. The team also made sketches of the sites for use in determining boundaries of the properties to be included. After reviewing documentary data and photographs and comparing them with the requirements for listing on the National Register of Historic Places, the applicable criteria for listing were determined and the integrity of the various structures assessed. Requirements of integrity for registration were based upon knowledge of the conditions of the existing sites. Upon consultation with the National Park Service and the Michigan State Historic Preservation Office, the fourth site, the tower ruin at Turkey Ridge, was deemed not intact enough to meet the criteria and was excluded from the nomination. See Part F of this document for discussion of how the three properties and their associated outbuilding(s) qualify for listing on the National Register of Historic Places.

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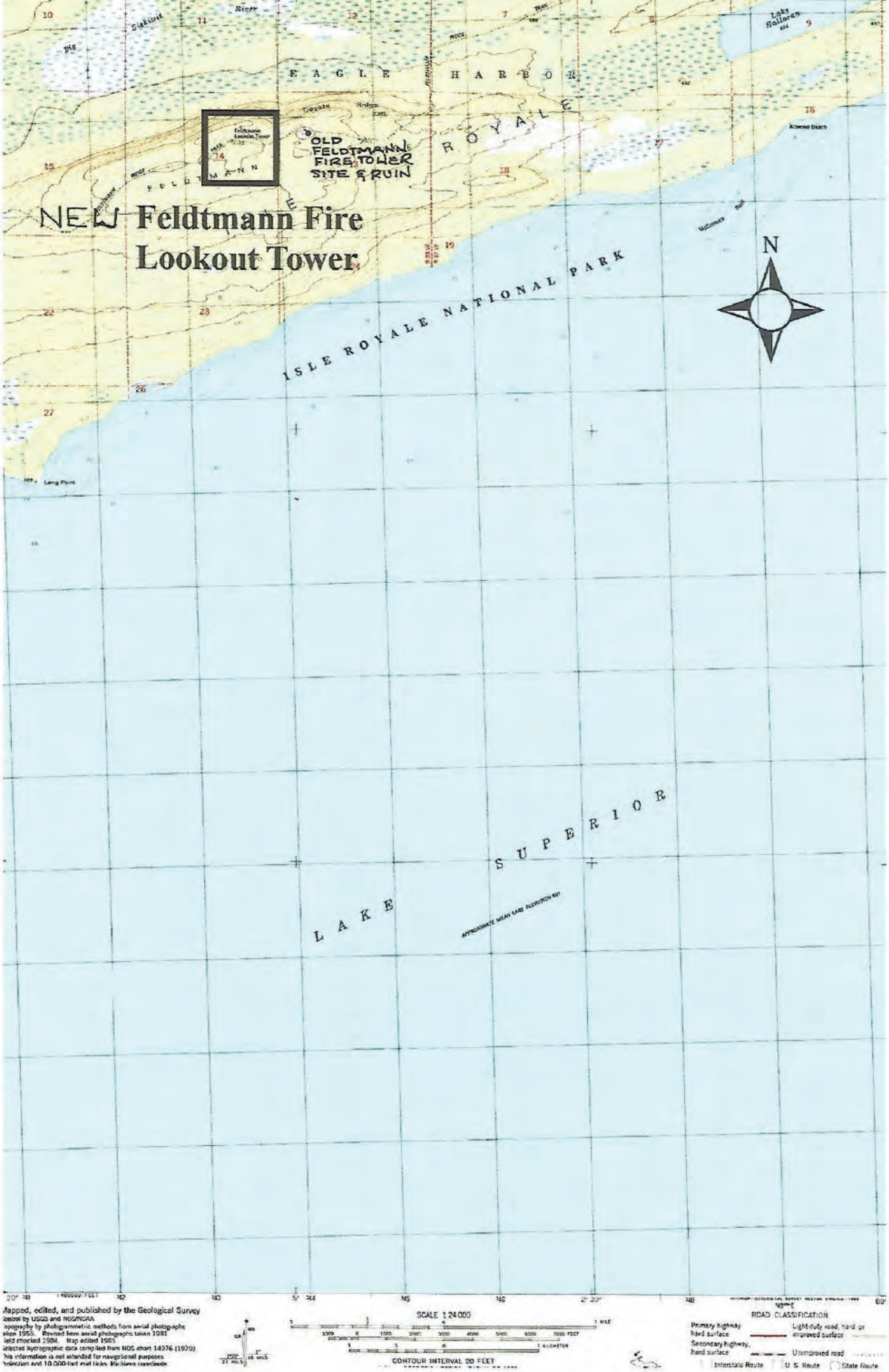
MULTIPLE PROPERTY NOMINATION SITES ▲


NEW Feldtmann Fire Lookout Tower
OLD FELDTMANN FIRE TOWER SITE & RUIN
EAGLE HARBOR
ROYALE
ISLE ROYALE NATIONAL PARK
N
LAKE SUPERIOR
Long Point
Mapped, edited, and published by the Geological Survey
SCALE 1:24 000
CONTOUR INTERVAL 20 FEET
ROAD CLASSIFICATION
Primary highway, hard surface
Light-duty road, hard or improved surface
Secondary highway, hard surface
Unimproved road
Interstate Route
U.S. Route
State Route

Mapped, edited, and published by the Geological Survey
Control by USGS and NOS/NOAA
Topography by photogrammetric methods from aerial photographs taken 1955. Revised from aerial photographs taken 1981
Field checked 1984. Map edited 1985
Selected hydrographic data compiled from NOS chart 14976 (1979)
This information is not intended for navigational purposes.
Projection and 10,000-foot grid ticks: Michigan coordinate

[redacted]

Mapped, edited, and published by the Geological Survey
Control by USGS and NOS/NOAA
Topography by photogrammetric methods from aerial photographs taken 1965. Revised from aerial photographs taken 1981. Field checked 1984. Map edited 1985
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Projection and 10,000-foot grid ticks: Michigan coordinate

SCALE 1:24 000

CONTOUR INTERVAL 20 FEET

ROAD CLASSIFICATION

Primary highway, hard surface — Light-duty road, hard or improved surface
Secondary highway, hard surface — Unimproved road
Interstate Route — U.S. Route — State Route

[redacted]

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

NATIONAL REGISTER OF HISTORIC PLACES
EVALUATION/RETURN SHEET

Requested Action:	COVER DOCUMENTATION
Multiple Name:	Isle Royale National Park Fire Towers MPS
State & County:	,

Date Received: 11/30/2020
Date of 45th Day: 1/14/2021

Reference number: MC100005999

Reason For Review:

__ Appeal	__ PDIL	__ Text/Data Issue
__ SHPO Request	__ Landscape	__ Photo
__ Waiver	__ National	__ Map/Boundary
__ Resubmission	__ Mobile Resource	__ Period
__ Other	__ TCP	__ Less than 50 years
	__ CLG	

__X__ Accept _____ Return _____ Reject _____ Date

Abstract/Summary Comments: The cover lays out the historic context for evaluating fire management practice in the Federal government and how that was translated into Isle Royale. The context describes the use and utility fire towers as part of that management practice, and how the towers constructed at Isle Royale differ from their eastern US counterparts. The cover document also provides the property type analysis and registration requirements for the limited number of towers that are located on Isle Royale.

Recommendation/ Criteria: Accept Cover document

Reviewer Jim Gabbert Discipline Historian

Telephone (202)354-2275 Date

DOCUMENTATION: see attached comments: No see attached SLR: No

If a nomination is returned to the nomination authority, the nomination is no longer under consideration by the National Park Service.

H32(2280)

Memorandum

To: Keeper of the National Register of Historic Places

From: Acting, NPS Federal Preservation Officer TURKIYA LOWE Digitally signed by TURKIYA LOWE Date: 2020.11.25 12:38:07 -05'00'

Subject: Multiple Property Documentation for Isle Royale National Park Fire Towers and National Register Nominations for Ishpeming and New Feldtmann Fire Towers, Michigan

I am forwarding the Multiple Property Documentation for Isle Royale National Park Fire Towers and National Register Nominations for the Ishpeming and New Feldtmann Fire Towers. The Park History Program has reviewed the multiple property cover and found it to provide an appropriate historic context. It has also reviewed the individual nominations and found them both eligible under Criteria A and C at the Local level, with Areas of Significance of Conservation and Engineering.

The State Historic Preservation Office (SHPO) and chief local elected official(s) were sent the documentation on August 18, 2020. Within 45 days, the SHPO _x_ supported __ supported with comments __ did not respond. Any comments received are included with the documentation.

If you have any questions, please contact Kelly Spradley-Kurowski at 202-354-2266 or kelly_spradley-kurowski@nps.gov.

OUTSIDE THE BOX, LLC
1428 Floyd Avenue
Richmond VA 23220
A Certified HUBZone and EDWOSB

TRANSMITTAL

Date: October 9, 2020

To: Dr. Kelly Spradley-Kurowski
National Coordinator, African-American Civil Rights Network
Historian, Park History Program
National Park Service
1849 C Street, NW
Mail Stop 7508
Washington, D.C. 20240

From: Deborah Harvey, MPH
Project Manager
Outside The Box, LLC
916 Ridge Crest Avenue
Carthage, MO, 64836

Contract Number: 140P60180089

Outside The Box Project Number: J18.07

Transmitted Herewith:

NO.	DESCRIPTION
1 file	National Register of Historic Places MDPF form for Isle Royale National Park Fire Towers, in .pdf format

All comments from the Commenting Authority and from the Midwest Regional Office of the National Park Service have been incorporated into this document. Maps and photographs are embedded in this document.

If you have any questions, please contact: Deborah Harvey, (404) 210-0321.

H32(2280)

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