



W.J. McCABE (DULUTH) CHAPTER IZAAK WALTON LEAGUE OF AMERICA

P. O. BOX 3063 • DULUTH, MN 55803

May 16, 2024

Mr. Tom Hall, Supervisor
Superior National Forest
8901 Grand Avenue Place
Duluth, MN 55808

RE: Forest Plan Amendment of management direction for the Boundary Waters Canoe Area Wilderness.

Dear Supervisor Hall,

These comments are submitted on behalf of the W.J. McCabe Chapter of the Izaak Walton League of America (IWLA) and the Minnesota Division of the IWLA to provide our input on the upcoming amendment to Chapter 3 of the forest management plan regarding the Boundary Waters Canoe Area Wilderness (BWCAW). The Izaak Walton League was very involved in the original establishment of the Boundary Waters Canoe Area and the McCabe Chapter played an active role in the development of the 1993 BWCAW management plan. We are encouraged that you and your staff are engaging a wide array of stakeholders in the preliminary thinking regarding a revision. We continue to have a strong interest in the BWCAW, its ecosystems and the wilderness experience for current and future human generations. We want to thank the Superior National Forest staff for all the good work they do to protect the BWCAW, in spite of limited funding and staffing and changing administrations.

We realize that the forest management plan for the BWCAW must address traditional challenges such as visitor overuse and degraded campsites, but new challenges have emerged as well. Climate change is altering the vegetation and habitat for fish and wildlife, manifested as shorter winters, warmer seasons, greater risk of forest fire and violent storms, and altered water cycles. Fighting forest fires across the US has diverted staff and financial resources from the Superior National Forest; staff retirements and recruiting difficulties have also reduced staff from protecting the BWCAW.

The BWCAW is an important place for humans to retreat from each other and the human-built environment, a place that brings natural peace and enjoyment and a way to challenge one's ability to interact with nature without many modern aids. We generally support the goals set forth in the 1993 BWCAW plan and offer our perspectives for this amendment.

The "semi-primitive non-motorized wilderness management areas" are of special interest, since these areas constitute the largest area of the BWCAW and support most of the human-wilderness experience opportunities and values. It is also vitally important to maintain the "almost nonexistent presence of humans" condition of "pristine wilderness management areas". We also

support the maintenance of “semi-primitive motorized wilderness areas”, as these more peripheral areas offer access and experience to semi-natural areas to people without the ability to portage and handle canoes or other watercraft.

Desired Conditions: Regarding the “desired conditions” for the semi-primitive non-motorized portions of the wilderness, we suggest that they are too liberal, both in regard to resource protection and the opportunity to find solitude.

The Wilderness Act of 1964 does not recognize the compromises you propose. The language is clear and concise: “(1) generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation.” The language you propose would allow for resource damage that is “Some areas may be substantially affected by visitors” and that this degradation would be “Apparent to most visitors.” Similarly, your proposal states that there would be “Moderate to low opportunity for isolation and solitude.”

We do not find in the Wilderness Act any caveats that state that because preserving these two most central reasons for the creation of a Wilderness might be difficult, or unpopular with commercial interests, that these two prerogatives be watered down to the point where the Wilderness offers a “state park” experience. While some zones (Pristine Wilderness on your map – commonly called Primitive Management Areas) are prescribed to remain untouched and with ample solitude, the fact is that this is not where visitors generally go. Should not someone with limited time or physical ability expect a “wilderness experience” where they can actually go? The PMAs were created not to give the U.S. Forest Service an “out” on providing solitude and untouched areas, but because no one was actually going into those areas, largely because they lacked access and water ways and lakes of any appreciable size and desirability.

We urge the Forest Service to seek creative ways to reduce congestion in the areas that the majority of visitors actually go, and to increase opportunities for solitude and reduced congestion in the semi-primitive non-motorized zones. While there might always be congestion at entry points and the first lake beyond due to the popularity of the BWCAW, most of it should be managed to the levels of what you term “Primitive Wilderness”, which at least retains the possibility of enjoying the goals of the Wilderness Act. We realize that this may be painful in that some quotas might need further reduction, or new ways of encouraging people to move more frequently may be required, but we view these goals as central to adherence to the spirit of the Wilderness Act. To that end, we are ready to work with the Forest Service to achieve such goals.

Density of people: Our primary interests are with the nature of the wilderness experience for visitors, and protection of the resource, given increased number of visitors and the way they travel in the BWCAW. We have seen how the 1993 management plan resulted in restoration of forests and lakeshores and improvements to the wilderness experience for the public, as access permits controlled and distributed the parties entering the BWCAW. The wilderness experience should mean few encounters with other people. Fewer people mean fewer problems with crowding and encounters, less competition for portages and campsites, and an enhanced wilderness experience for visitors.

The most vulnerable areas of the BWCAW are the more peripheral trails and lakes, where parties travel one or two portages into a lake and occupy one campsite for multiple days. In the past, users generally traveled loops among lakes and rivers; today, more users set up a base camp,

leading to more crowding in the peripheral lakes, degraded campsites and more human encounters in those areas for all. This has resulted in “traffic jams” on portages and competition causing campsites to be occupied earlier in the day with longer and heavier use of campsites. The current limit of 14 days on any one campsite (page 3-54) is more appropriate for state parks than for the BWCAW. Such entrenched occupation invites abuses of campsites, such as trenching around tents, accumulation of trash, overuse of latrines, depletion of natural campfire wood, and damage to vegetation around a campsite. We would suggest reducing the number of days allowable in campsites from 14 down to something more compatible with carrying capacity, perhaps 4 days.

The nature of a wilderness experience is escape from human encounters, and the semi-primitive non-motorized wilderness MAs offer the greatest opportunities to the public with added protections for the ecosystems and for public safety. These are the areas in which people seek to experience wilderness. More emphasis must be placed in the amendment to limit encounters on the water, on the trails, and in the campsites to better ensure that the BWCAW delivers and can sustain these opportunities in the future. Can the Forest Service find ways to reduce base camping and encourage loop transit within the semi-primitive non-motorized wilderness MAs? Some ideas: issue some permits that require movement away from peripheral lakes to reduce damage and encounters; issue permits for individual lakes; limit the number of campsites or nights that a campsite may be used. The Forest Service can also do more to encourage those looking for camping in a natural setting to consider the many wonderful camping opportunities outside the BWCAW but within the Superior National Forest. Many national forest campsites include walk-in campsites that provide semi-wilderness experiences; if there were more such sites, that would satisfy more visitors.

We do want to point out that we are well satisfied with the current management plan on bringing dogs into the BWCAW: p 3-54 “Pets must be under voice or leash control at all times” and oppose any effort to restrict dogs to leash only or to ban dogs completely. Many visitors want to share their experience with their dog; grouse and duck hunters depend on dogs; visitors may feel safer camping with a dog. We agree that uncontrolled dogs (and other uncontrolled pets) can cause disruption to wildlife, increase noise, and cause pollution and this cannot be tolerated. Are there ways to ensure that pets are controllable through the permit process? Certainly, education programs can and should emphasize the risks associated with uncontrolled pets and discourage bringing them to the BWCAW.

Bear-human issues: We want to express our concern regarding the new food storage policy, 09-09-24-2, that requires hanging food containers at great height, limits containers to the “grizzly bear certified (GBC)” items, and exerts an extreme fine or jail time. We understand that this policy will not be enforced in 2024. Nevertheless, implementation of this policy is impractical and plays against the role of the BWCAW in giving people wilderness access. Human behavior is the cause of bears becoming habituated to foraging in campsites. Many campsites do not provide the requisite trees to provide access to hanging food containers 12’ high. Many GBC containers are not suitable for canoe or portage use. The extreme penalties are out of balance with other behaviors, such as improper campfires. The Forest Service needs to balance the inherent risk of bear encounters against the practical requirements of accessing and experiencing the wilderness. We suggest incorporation of increased public education on the risk of bear interactions and tools and methods to avoid bear habituation and nuisance behavior. The Forest Service could consider providing metal bear proof storage boxes in campsites where chronic bear problems occur as a more targeted way to deal with this problem.

Public education: A great benefit and value of the BWCAW is that visitors learn the importance of the “leave no trace”, wilderness ethic, and the escape from human encounters in wilderness areas. The permit acquisition process has a learning and relearning component that reminds visitors of the kinds of behaviors that sustain the wilderness for all. Public education can embed a wilderness ethic and appreciation beyond the canoe trip. In addition, the BWCA outfitters and the outdoors experience “camps”, such as scout camps, Widjiwagan, Outward Bound, Camp Voyageur, and others, have important roles to play in embedding good practice and wilderness ethic in children and families who participate. Recognizing and partnering with these types of organizations on wilderness ethic education can spread the word on how to sustain the BWCAW experience. We encourage the Forest Service to work with these types of organizations, churches and others to reduce barriers that prevent underprivileged and disadvantaged youth from experiencing the wilderness and support programs that provide camping opportunities to them.

Visitor education before and during permitting must continue to emphasize ways and tools to prevent human-bear interactions, why living trees and other plants should not be cut or damaged, disposal of fish remains, removing all trash, and the value of “leave no trace” to sustaining the wilderness. This ethic has positive benefits well beyond the BWCAW, and can change user impacts to other wilderness areas as well as positively impact all camping and outdoor activities in recreation areas.

The wilderness experience responsibility: With the advancement of wireless communication, it seems visitors are forgetting their responsibility to prepare themselves for some risk in their wilderness experience in the BWCAW. While there are legitimate reasons to seek help from outside such as cases of broken limbs, heart attack, drowning, forest fire, blowdown and similar catastrophes increasingly, county rescue operations are being called in for non-life-threatening reasons. This is a drain on rescue resources and diminishes the wilderness experience for other campers. Permits could require users to acknowledge their responsibility to assume the risks involved with travel in the BWCAW and be prepared for remote non-motorized travel by foot and by canoe. We might suggest that the USFS consider funding sources, including from rescued visitors, to help support county services.

Pollution: Watershed protection must always be a priority for sustaining the ecosystems of the BWCAW. Pollution can take many forms, including nutrient eutrophication, various toxins, light and noise. We urge the Forest Service to resist industrial development in the BWCAW watersheds, and to prevent light and noise pollution and discharge of polluting chemicals into the watersheds. In addition to watershed sources, visitors introduce pollutants through campsite use, hunting and fishing activities.

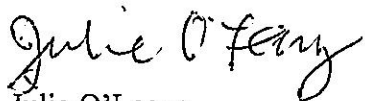
Controlling overuse of campsites and their latrines and educating visitors on their appropriate uses to protect ground and surface waters is important. Visitors also need to appreciate that a wilderness experience includes peace and quiet as well as the beauty of dark sky, and that sound and light greatly affect the experiences of other campers in the wilderness.

The McCabe Chapter has long advocated for lead-free fishing tackle and ammunition. The BWCAW is a haven for wilderness hunting and fishing, but these activities have introduced lead into the ecosystem, with risks to waterbirds such as loons, mergansers and other waterfowl, and to carrion consumers such as eagles and various other wildlife. The BWCAW supports the

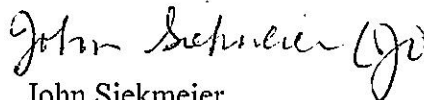
largest nesting population of loons in Minnesota and the experience of hearing and seeing loons is a significant and sought-after experience for visitors to the BWCAW. We encourage banning lead tackle and ammunition in the BWCAW. We note that manufacturers, such as Linder, are phasing out production and sales of lead tackle and other vendors will follow suit. We urge the Forest Service to investigate its authority to regulate toxic lead in tackle and ammunition under the Resource Conservation and Recovery Act (RCRA) and/or work with the Minnesota DNR to require nontoxic tackle and ammunition, as the DNR does in state natural areas and parks. We also suggest requiring the use of barbless hooks, which can cause less harm to fish while allowing successful fishing experiences.

Tracking progress: The only way to know if a management plan is effective in meeting its standards and sustaining desired conditions is to regularly monitor the condition of the ecosystems and the condition of the visitor wilderness experience. We encourage the Forest Service to get a handle on current usage and trends in usage; for instance, trends in “base camping” vs loop transits and trends in human encounters. Monitoring the condition of campsites and portage trails is critical. We encourage the Forest Service to prioritize means of routine monitoring, perhaps in partnership with universities and other organizations. Visitor surveys that maximize survey returns can also be effective. Management can only be adaptive and responsive to conditions and problems if there are data to understand the problem.

In closing, we want to offer the expertise of our educators, scientists, and experienced wilderness users to your efforts in refining the forest management plan for the BWCAW. We support your work in sustaining this incredible gem for future generations. We will certainly participate in future public discussions regarding the forest management plan for the BWCAW on ways to preserve these wonderful ecosystems and the opportunities they provide for wilderness experience.



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