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Comments: Founded in 1968 the Sierra Club North Star Chapter is a non-profit environmental organization representing over 20,000 members and 80,000 supporters across Minnesota. The Sierra Club works to safeguard the health of our communities, protect wildlife, and preserve our remaining wild places through grassroots activism, public education, lobbying, and litigation. As a leading grassroots voice working to preserve and protect Minnesota's environment, we empower volunteer leaders to act through environmental advocacy, community organizing, and outdoor exploration. We participate in the administrative process to encourage environmental health and sustainability, long term wildlife and habitat protection, and biodiversity goals.

The current Forest Plan should be updated with an amendment that will better protect the wilderness quality of the BWCAW. In 1964, in recognition of the need to protect and restore the wild areas of the United States, Congress enacted the Wilderness Act, 16 U.S.C. § 1131 et seq. Specifically, Congress wanted to ensure that "an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural condition." 16 U.S.C. § 1131(a). This Act identified a number of wilderness areas, characterizing such areas as places "where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain," that are "protected and managed so as to preserve its natural conditions," and that possess "outstanding opportunities for solitude or a primitive and unconfined type of recreation," 16 U.S.C. § 1131(c). Once an area is designated, the Act requires the federal agency responsible for the area to "preserve the wilderness character of the area," 16 U.S.C. § 1133(b). The most important consideration of a Forest Plan amendment should be the protection of the BWCAW's unique wilderness qualities.

The BWCAW is one of the most popular and heavily used wilderness areas in the entire Wilderness Preservation System. Over the years, increased numbers of visitors have begun to adversely impact the wilderness qualities of this unique area. People travel to the BWCAW seeking solitude, peace, quiet, and a natural, untrammelled and undeveloped environment. Unfortunately, for many of these folks they are no longer finding these attributes. The most important consideration for the Forest Service should be the protection of the BWCAW's unique wilderness qualities.

There is a need to limit the number of humans entering the BWCAW, because with too many people comes the degradation of the special wilderness characteristics. In addition, there is a need to limit the type of uses occurring in the BWCAW. Uses that are contributing to the degradation of wilderness character need to be curtailed. The Forest Service has stated: "Monitoring has indicated both social and ecological impacts, such as crowding, noise, light pollution, lack of campsite availability, littering, campsite and portage erosion, campsite expansions, water quality degradation, and other issues preventing the Forest (Service) from managing to standard. There is a need to update management direction to preserve wilderness character, while providing for opportunities for solitude or a primitive and unconfined type of recreation, restoring naturalness and protecting other features of value across the wilderness."

When there are reports of: litter, erosion occurring at campsite and portage locations, degradation of our precious waters, noise, and crowds - there is a need to limit the number of visitors. In 1964, Congress enacted the

Wilderness Act "to secure for the American people of present and future generations the benefits of an enduring resource of wilderness." 16 U.S.C. § 1131(a). The Wilderness Act requires that "each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character" of that wilderness area. 16 U.S.C. § 1133(b) [Section 4(b) of the Wilderness Act]. The wilderness character to be protected include "outstanding opportunities for solitude and a primitive and unconfined type of recreation," 16 U.S.C. § 1131(c), which implicates both landscape and soundscape elements.

The Forest Service itself recognizes this duty to conduct its management activities in a manner that protects the wilderness character of the BWCAW. The Forest Service Manual provides that "Forest Service managers are directed to choose preservation of the wilderness resource over human influence or activity," Forest Service Manual 2320.6, and otherwise makes clear that in management of wilderness values vis-à-vis other objectives, wilderness values must take priority. Forest Service Manual 2320.3. The SNF needs to update management direction to preserve wilderness character, provide opportunities for solitude, limit towboat use, limit cellular tower construction, restore naturalness, limit development and trammeling actions, and protect other features of value across the Wilderness.

The Sierra Club strongly suggests that trapping of wildlife no longer be allowed in the Wilderness - trapping causes undue stress and injury to wildlife species and requires equipment that is incompatible with Wilderness. Indiscriminate body-gripping traps on public land affect the welfare of wild animals and humans alike.

Under BWCAW Appendix B. Research Needs:

Impact from our changing climate on Wilderness character should be carefully researched, and although this may create natural changes to the ecosystems within the BWCAW and thus allowed to proceed, limiting additional human stressors may be necessary to protect the ecology and wildlife as the planet warms.