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Comments: Comments on the Forest Plan Amendment of Management Direction for the Boundary Waters Canoe Area Wilderness #65777

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When President Lyndon B. Johnson signed the 1964 Wilderness Act the entire world's population was approximately 3.2 billion people. In 1976 when I first came to the BWCA it was 4.5 billion. Today the world's population has exceeded 8 billion people. To assume that the recreational and educational experiences available to the average citizen over that time would remain the same would be a folly. Yet by enacting the Wilderness Preservation System the United States did something audacious, never done before or since. Designated areas were to be preserved for future generations to access the unique experiences and opportunities only found in wild places. They created places where time has the opportunity to stand still. Or at least to move more slowly.
"A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain." - Howard Zahniser
For the last 35 years my wife Nancy and I have called the edge of the wilderness our home and have made our living helping others experience, enjoy and learn from the woods and waters of the BWCAW. We've raised our family here, grateful for the lessons and joys we've had. Now our eldest son Ben is poised to take over the reins of our family business.
Over all these years we've been students of and advocates for the forests, animals, people and the management of the BWCAW and the northern boreal forest. We deeply love this place and the opportunities it offers those willing to meet it on its own terms. That is an important concept to remember. The BWCAW is a wilderness. Not for everybody. Not meant to be everything to everyone. Challenging, sometimes difficult and not always what people expect or want. It must be allowed to be what it is and humans must sometimes bend to those rules.
How to manage and maintain wilderness areas is a matter of policy, trial and error, reality on the ground and unfortunately, current political agendas. The goals of keeping these places as wild as they can be and preserving their essence for future generations is not up for debate. It is the law of the land.
So how best to manage the BWCAW going into the future? We have some ideas based on many years as professional outfitters, a lifetime of experience in the woods and learning about the boreal forest and this forest in particular. We appreciate the opportunity to comment on the subject.
Group size
Controllable impacts and changes to the landscape are largely a factor of the number of humans in any given spot. A simple solution would be to stop people from visiting the BWCAW. No resource degradation other than what nature decides to wield. But that would not fulfill the mandate of preservation and allowing for the experiences and enjoyment of the public who own these lands. It would be a drastic and unwelcome change to the local economy and culture of the area as well.
An issue to be addressed is group size. Nine people are currently allowed to camp and travel together on a permit. This is a reasonable number in many respects. However, many BWCAW campsites do not have the capacity to hold more than one or two tents or have 18 feet tromping around the site without impacting soils, expanding the perimeters and harming vegetation.
Average actual group size has been relatively consistent over the years at about 4. In our experience that is changing. Larger groups are more the norm as permits become harder to get and people rediscover wild places after pandemic isolation.
Since there is no limit on the number of larger groups relative to the total number of permits allowed in an area, it

can and does happen that some areas will have more large groups than the campsites can reasonably accommodate. Bad things happen.
A first step would be to inventory campsites throughout the BWCAW as to a reasonable occupancy and capacity. A second would be to publish that information so that the public can access it and plan accordingly.
Two solutions could be further explored. Either - every BWCAW campsite must be able to accommodate 9 people and 3 or 4 tents. This is not really practical but is an option to contemplate. Or there needs to be some way to match the number of larger groups with the number of larger campsites in an area.
Last would be to simply designate some areas of the BWCAW off limits to camping by groups of more than 6. Each of these ideas has its management challenges but they are a way to solve a problem that exists.

Travel Trends
In the 1960's and 1970's it was the norm to visit the BWCA (as it was then called) for a week or ten days and travel most days. Now the trend is much shorter trips and travelling less or just base camping at a single site. Our average trip is now 4 days and about half of our guests stay at one site within a short day's travel of their entry point. We encourage more travel and sing the praises of the greater experience when you move but not everyone is looking for or capable of traveling more.
This is a major factor in campsite impacts and resource degradation. Just being in a site all day has a larger impact on the softer surfaces and the surrounding landscape as people wander, forage, and search for good fire wood. People also get bored… and do bad stuff. If a group is on the move each day or most days there is less opportunity for those impacts to occur. As we used to say when guiding groups of kids, "a tired kid is a trouble free kid". The same goes for adults.
It is impossible and impractical to completely mandate how people will travel as the freedom to choose your own adventure is the essence of a wilderness trip. Perhaps there are some ways to be creative is managing this issue. Some parts of the BWCAW are great locations for a base camp, durable surfaces, open and large campsites and big spaces where social impacts are less noticeable. Some parts of the BWCAW are more fragile and reward those willing to explore them.
It would be reasonable to consider some travel zones based on group size and travel mode. Some zones would allow but not require base camping - and people staying in those areas would know to expect a different experience than they would in other areas. The rest of the BWCAW could be designated as a two night maximum stay at any campsite with obvious exceptions for weather. This would require a more detailed permit system and some education but it could be implemented over time.
I would not be in favor of reserved campsites or designated travel routes as it is the unplanned exploration and adventure that makes the experience BWCAW what it is.

Perimeter issues
Written into current management plans for the BWCAW are exemptions to the rule that a permit is void once the group leader leaves the BWCAW proper. For example, you can paddle the border through Gunflint Lake from the Granite River over to South Lake as long as it is a continuous trip. (This is an example of a rule not found anywhere in public information about the BWCAW)
There are other places not specifically listed in the rule book that would be reasonable and practical in the effort to keep people moving.
1. Leave the BW at Moose Lake on the east end of the border chain and re-enter at Royal River. This would also apply to John Lake and Pine through MacFarland and East Pike to Pine through MacFarland. As long as it is a continuous trip there is no reason it should not be allowed.
2. Leave Duncan Lake and travel through Bearskin to Daniels (or vice versa) to avoid the Long Portage. This is a serious issue impeding travel for most folks who want to move more but the Long Portage itself is daunting and the water impacts caused by beavers make it hazardous and the makeshift paths created to circumnavigate the wetland created by the beavers causes a good deal of impact to the resource.
3. Crocodile River entry is rarely accessed from the actual river side. More often it is accessed from East Bearskin Lake. This is a limiting factor for travel in that area. People could be allowed to spend one or more nights on Crocodile and then move onto Alder through East Bearskin or vice versa. The overall use of this option

would be small and have minimal impact but would encourage more movement in the area reducing campsite degradations from base camping.
There are other areas around the perimeter of the BWCAW that would benefit from similar practical additions to the travel models.
Permit Fees
Wilderness areas are supposed to be free to the public. It is also a reality that people who use the BWCAW have impacts and expectations for maintenance and therefore a fee structure of some kind is reasonable. The current fee structure is per person per trip with a reservation fee. The reservation fee is small and has little effect on people who would reserve permits gratuitously - either to keep others out of an area, without really knowing if they will be able use that permit or hedging bets on what day the weather will be good.
An obvious solution is to follow the model used in the Quetico Park. They have a large reservation fee and the potential refund diminishes at the permit date approaches. It would be important to have some refund available even for last minute cancellations so there is incentive to cancel.
We also feel that $16 per adult and $8 per youth is a real bargain. Most people would gladly pay more to be in the BWCAW. Raising the camping fee or the reservation fee would offer more funding to do research, maintenance and enforcement/education. As long as those fees actually go to the BWCAW and its operation that would be a reasonable addition.
It would also be reasonable to charge by the night. Raising fees would certainly reduce overall use. While that is a difficult concept for some there are private organizations which would likely provide opportunities for scholarships or subsidies to those in need.
Permit Quotas
The BWCAW permit system was never intended to be full. The quotas were established based on limited historic use numbers and an estimated reasonable occupancy of designated campsites in a travel zone. These were then tweaked over time to adjust for real issues that occurred. Quotas also had some padding to allow for flexibility in the system. Use patterns have changed over the years and interest in the BWCAW has grown significantly post pandemic. The experience I had in 1976 entering at the Nina-Moose river to Lac LaCroix is not the same experience one would have there now. Nor is it reasonable to expect the same experience. Even though the permit numbers have been reduced there are more consecutive days that all or most of the permits are used over a longer stretch of the season. Quotas may have been reduced to make it so everyone finds a campsite in some areas which have experienced crowding but it does not allow enough flexibility in the system to give those campsites a rest between uses. The same impacts are observed on perimeter portages and common routes. There are still too many people in some places at some times.
One option to mitigate this effect would be to open more designated campsites in areas where they could be accommodated. As a specific example, Daniels Lake has at least two locations that are excellent candidates to be a site with minimal work or impact. I would not raise the quota but it would give all the sites more recovery time. There are sections of the BWCAW that would offer a higher level of challenge and adventure to those willing to put in the effort but as there are no designated campsites they only see minimal use or illegal use.
What about the PMA's? They are not a good example of what a wilderness canoe trip is meant to be. These areas were meant to mimic the Quetico experience. To camp in a PMA one has to make a special trip the local USFS office. They are not available from all cooperators. You then have to pick a specific zone for specific nights. While the intent was good the reality is less than satisfying. Without going into more specific examples there are a number of places in the BWCAW that could be utilized at some level which would encourage travel and exploration beyond the basic routes.
In the past when this has been discussed the issue is brought up that the USFS can barely maintain the portages and campsites that currently exist. Fair enough. If fees were raised and the experience is enhanced there will be more interest and more funds available to do the needed work. Chicken and egg. Another objection is that expanding travel routes in itself "degrades" the wilderness. I would point out that the boreal forest the BWCAW occupies has not been a pristine wilderness for hundreds of years and most certainly most of it had been logged, mined or developed in some way in the last 150 years. While it is still one of the most untouched and undeveloped places in the lower 48 states - it is not a pristine wilderness. As we move forward in time it becomes more wilderness like every day, but I believe that opening up some parts of the BWCAW to reduce

pressure on the rest of it would be an overall win for the preservation and health of the forest.

Invasives

Eliminate live bait. And make lead free tackle mandatory. Just do it. The Quetico Park went to no live bait, no barbed hooks and strongly encourages lead free tackle. It is still a great fishery and people are successful there. Making these changes will reduce invasives transported by minnow buckets, will keep earthworms out of the landscape and stop the spread of rusty crayfish. It might even have the effect of improving fishing over time.
Aquatic invasives present a serious challenge. Short of closing travel routes or quarantine areas, education about specific lakes with contamination and some level of enforcement is all you can do.
It needs to be pointed out that many of the invasive plants in the BWCAW come from fire crews. They are government crews and can be trained to be more invasive aware and have effective solutions.

Permit Season

The current permit season in the BWCAW goes from May 1 to September 30. As climate change effects the landscape more and more people are visiting in October and the same will be said of April as the years go by and temperatures warm. It would be a proactive solution to extend the permit season into October. Perhaps have a reduced rate but require a permit just the same. There are a few places that get overcrowded in the first days after the regular season closes. Issuing permits and extending enforcement and education further into the year would be a net gain in resource preservation.

Day Use

Stairway Portage on a lovely summer Saturday afternoon is not a wilderness experience. We limit our guest's use as best we can but that doesn't stop people from going to another outfitter or the locals who have all their own gear from going there too. There are several other places in the BWCAW that have similar issues on some days of the season. There needs to be a day use quota established for some places in the BWCAW and an equitable method to reserve and distribute them.

Feedback Opportunities

One thing that is missing from BWCAW management is feedback from the public. Very few people stop in at the front desk in Grand Marais to tell someone what a wonderful trip they had. They might stop in to complain or file a bear report. There have been surveys over the years for specific time periods but they were expensive and cumbersome and limited in scope. When people are given the opportunity to comment on policy more formally - like this - it often brings out special interests and people with skin in the game. More options to give feedback in real time and in more focused ways would level the playing field and allow for a better understanding of issues at hand by a larger number of people.
Why not create an email survey for every BWCAW permit holder as their trip ends so that the public can weigh in on their experience? That may sound daunting, but if you create a quick version where it's simply a couple of questions and a more in-depth version that people can choose to complete I think you would find a good deal of helpful information and you might even find some helpful suggestions and warm, fuzzy positive reinforcement for your efforts. Technology makes this kind of communication really easy and data is king.
Another underutilized resource is outfitters and camps. Every one of our parties does come back at the end of their trip and they tell us how their trip went, what was bad, what was good and we accumulate data every year. We have valid, real time, contextual information. We just need to feel like you want to hear it. If there was a way for us or our guests to communicate those experiences more easily all would benefit.

Rules

There have been several instances where people are told they are not allowed to do X in the BWCAW and yet the rule they supposedly have broken is not available to them in a reasonable format. "All the rules are on the back of the permit!" No, they are not. But the BWCAW camping guide that you received with your permit confirmation has all the rules. It does contain more information but not all the rules.
There needs to be a publicly available, reasonably worded, document that people have access to with every rule, law, and policy and points of etiquette people are expected to follow. There will always be those who choose not to look for the rules but there is no way to credibly enforce any rules if people do not know what they are.

Fire

Fire is part of this forest. It is the renewal agent and the driving force behind many aspects of the overall ecosystem. If we truly want to call this a wilderness, if we truly want to preserve the wilderness character of this landscape - then leave it alone. Let it burn when it wants to. Prescribed burns have been marginally effective in achieving goals and in some cases have created new issues. Invasive species from fire crews gear, using chemical retardants and other normal fire activity are not compatible with wilderness. Fire suppression is also ridiculously expensive and rarely effective. Certainly there are cases for fire suppression in some situations. This is just a plea for a shift in priority. If suppression is not a priority it will have obvious impacts on travel and use by the public. Therefore there will be economic impacts that may not be popular. But if you want to call it wilderness - leave it alone.

Conclusion

The BWCAW is a spectacular place and offers experiences not available anywhere else. Its long term preservation is paramount and yet the ability of the public to see it and experience that preservation is also required. That balance is a challenge for managers and those who are concerned with both sides of this interesting dichotomy. All of the suggestions and ideas presented here are based on experience and firsthand knowledge of the place we love and make our living from. All of them present challenges to the current way of doing things and will take effort, money and more importantly, time. As you search out solutions to the maintaining and managing the Boundary Waters Canoe Area Wilderness please consider some of these ideas and how they can be part of a positive use of public lands. A well-researched and implemented management plan will help future USFS officials achieve their goals and mandates to preserve the wilderness character of the BWCAW and provide recreational opportunities for the public. We want our grandchildren to have the same kind of experiences we've had in our lives. Thank you for the opportunity to weigh in.

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