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Comments: Scoping Comments for new BWCAW Plan

5/17/24

It's good to hear the Forest Service talking about the importance of protecting wilderness character in the outreach part of this scoping. We're happy that the Forest is going to take a close look at the old wilderness plan and consider improvements, and we appreciate the opportunity to comment.

Nonconforming uses. This is a chance to address all the things going on in the Boundary Waters that aren't compatible with its wilderness designation. Practices that have gone on for years, that we take for granted because we're used to them, should be dealt with here. Please keep in mind wilderness management principles directing you to favor wilderness dependent activities and manage allowed special exceptions as tightly as possible so that they will have the smallest possible impact on wilderness character. Do thorough scoping among district personnel who may have noticed something that isn't in keeping with best wilderness stewardship practices. Identifying these issues in the plan may lead to their being taken care of at some point.

We are close to 50 years out from the passage of the BWCAW Act and it still hasn't been fully implemented. How about a goal: full implementation and on the road to necessary restoration, with in-district office wilderness education restored and all field-going positions filled - with wilderness-, not fuels- or timber-qualified people, by 2028.

Boundaries. The BWCAW boundary should protect equally the entire area within it. Management zones may be a necessary exception in this wilderness, but any move toward thinking of some areas as transition zones - not REAL wilderness, where regulations aren't so important - is unacceptable. One time we paddled Loon River to get to Lac La Croix and were shocked to see buildings, lawns being mowed, lots of purple loosestrife, fancy docks, all within wilderness boundaries. Some of this may be due to an old, probably outdated agreement with the DNR about state lands in BWCAW: this may be a good time to revisit.

The Saganaga Corridor is a sort of management zone established by the FS to rationalize all sorts of nonconforming uses. The wilderness has pretty much lost there, but we can assume that there will be new uses, new issues to come. Possibly the new plan can do something to establish firm limits that don't exceed what's currently accepted. If snowmobile use is still uncontrolled on Saganaga (and possibly other places) it should be scaled back to precisely what is allowed by law, not considered an established and acceptable state of affairs.

Wildlife. The new regulation requiring proper hanging or secure storage of food is a good attempt to protect bears. The 2004 Wilderness Plan called on FS and MNDNR "to evaluate the effects of an exemption from the statutes prohibiting the placement of fish remains in lake waters." Deep water fish remains disposal, if allowed, may be a good addition to the methods listed as acceptable. If this still hasn't been done, please carry it forward into the new plan. We'd also like FS to prohibit the hunting and trapping of wolves in BWCAW - possibly by working with DNR to ensure an agreement to establish a permanent no hunt/trap zone for wolves within wilderness boundaries; prohibit all lead tackle and shot in BWCAW.

Towboats are cited as one reason that the revision of the BWCAW part of the Forest Plan has become a priority. We hope that the lengthy revision process is not being used as a tactic to further avoid bringing motor use levels into compliance with legislation and stated agency policy. The Forest Service's decades long failure to limit towboat use, allowing the overall legal motor cap to be exceeded, has been shameful. We ask the Forest Service to begin immediate action to cut excessive use under the authority of the existing plan; waiting until after this

years-long revision process is complete would be unacceptable.

We ask the FS to reevaluate the need for towboats (a process that was apparently started during the Needs Assessment outreach). If tow use is to continue, we would like to see the new plan retain the old wording on towboats for the most part: "Towboat use will be limited the the 1992 levels for numbers of boats, trips, current operators, and specific lakes. Growth will not be permitted beyond these limits." Clarification will be needed. "Trips" should be defined as "each round trip a tow takes in and out of wilderness" or similar, not the "boat day" sleight of hand the FS tried, starting in about 2008, to get around the fact that towboat use had blown the motor cap. If it hasn't already, FS should accept that the legal limit is 1342 trips per year and start pruning down to that.

Of course "current operators" will have changed, but in doing any revisions the intent of the original plan, prior court decisions and the '78 legislation have to be rigid guidelines.

As with so many wilderness management issues, if the FS had honestly implemented the 1978 legislation promptly and efficiently, all parties would have long since adapted to the tow situation and there would be no messy tangle of issues to navigate now.

Fire. The current plan has a good statement about fire's role and lightning fires, and is OK on special considerations for wilderness regarding suppression. We are referred to the BWCAW Fire Management Plan for more information, which can be confusing for those not with the agency. (Will this be updated along with the wilderness plan?) Then, FS "will analyze and assess planned ignitions in the Wilderness." That's it. There is so much at stake around the very controversial practice of management ignitions in wilderness that it seems that the plan should go into it in more depth than this, keeping the following points in mind:

Management ignited fires are nothing like fires that ignite and burn naturally; they can't be said to fill the role fire has had historically.

Management ignited fires are more dangerous than ever, now that the climate is changing, given that existing models are increasingly ineffective at predicting fire behavior.

Again considering climate change: a burned area no longer should be assumed to protect its surroundings from fire, and in fact is at risk itself from new fires.

The fact that wilderness that has not burned or blown down in recent years is increasingly rare, with an ever-decreasing amount of old growth, should be considered when deciding whether and where to burn.

Under the FTEIS of 2001, which lived on for many years after its built-in expiration date, we saw that objectives, fuel load assessments and interpretations, and promises can all shift with changing personnel, budget, and evolving modeling and probably lots of other things. We'd like to see the new plan lay down some firm guidelines, coming down on the side of the fewer the management ignited fires the better. To protect wilderness character, wilderness ecosystems must be kept free of human manipulation to the maximum extent possible.

Overuse. A map used during the public outreach phase of this process shows a surprising number of sites that haven't been surveyed. Unless it's a mistake, it indicates either a shocking level of incompetence over on the west side, not enough wilderness rangers, poor communication ... or maybe it's support for the idea that the wilderness portions of each district should be consolidated into one wilderness district, with a district ranger and other personnel focused solely on wilderness stewardship.

The number of campsites the map indicates fall below standards is shocking, too. With all the good efforts that have gone into site restoration over the years, along with considerable efforts to encourage people to use less-traveled routes, it's discouraging to see all these red tents. And of course it's even worse to be on these sites and see the painfully exposed roots, brutal erosion, sterile absence of understory plants and so on. Possibly a group size limit of 6 along with a significant drop in the quota would eventually make a difference.

On 3-48, suggest removing "Maintenance of dam sites... is permitted in order to protect wilderness values." If

that's still going to be permitted, don't blame it on wilderness.

3-57, under environmental protection, state that trash can't be burned.

3-59 - If FS and DNR are through evaluating, perhaps chemical treatment in PMAs can be eliminated.

Implementation. The resources that will go into the production of a new wilderness plan are considerable. Ideally the result will be more than getting the plan into the current preferred format; we hope that the Forest will set priorities and take action to take care of problems that have long eroded wilderness character.

Rick and I have canoed in the Boundary Waters for 50 years, lived in Cook County for almost as long, and worked as wilderness rangers on the east zone.

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