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Comments: BWCAW Forest Plan Amendment

As the US Forest Service begins the process of amending the Superior National Forest Plan as it relates to the BWCAW, the Ely Outfitters Association would urge the USDA to truly have a well rounded perspective as they look at an effective plan of management. Although we understand the need to review and evaluate the way the USFS manages the BWCAW, we also need to remind ourselves that we are dealing with an area that is doing very well. It is enjoyed by many different types of user groups and the ability of those user groups to continue to enjoy the area should be strived for. Walking hand in hand with the ability for a diverse group of people utilizing and enjoying the BWCAW is the outfitting community that offers services to enhance the ability for many to enjoy the area. Our members are also a wealth of knowledge in terms of what the public seeks to find when visiting our area. At times the resources of our members has been underutilized and some very ineffective and damaging decision making has occurred. We would hope that a very open process is looked to as we move through creation of a new plan that takes into account the vast number of years of experience our community has and the knowledge we have about this area.

We understand more detailed information will come later in the process, but we will briefly touch on the main bullet points presented in the USFS outline. Again, all of these topics have direct consequences on the enjoyment of our customers and our members ability to successfully help visitors enjoy the BWCAW. We look forward to helping in this process.

The first point addressed is that there is increasing visitation and changing patterns. Although there is always change, just a few years ago we were looking at decreased use of the BWCAW. There is obviously data on the most recent increase from those lower levels, but we must remember that some of this was driven by the drastic effects on everything with the pandemic. We should be very careful in how we address the current user patterns. The outfitting community really is worried about an approach similar to the most recent permit quota cuts that were handed down without any discussion and very little data to back up the cuts. Also, the outfitting community and other user groups had a bunch of great ideas of other ways to remedy some of the issues that were attempted to be addressed in ways that would be much less detrimental to the enjoyment of the area by the public. We would hope those same mistakes aren't made in this process.

As the plan relates to towboat use within the wilderness, we would refer to our past comments, as the USFS instructed us to do. The many benefits that the area receives in terms of a highly effective distribution tool that many area visitors depend on for their trips have been well documented. The businesses that have long provided these services would urge you to carefully examine all of the information that points to this continuing to be an important part of managing the wilderness. It must also be remembered that the current motor use cap that is being used to examine all motor use is incorrectly lower than is directed by the 1978 Act, as all of the previously exempt use hasn't been counted in that cap. There needs to be a reasonable recalculation of this number as directed by the most recent court ruling on this matter. Ignoring this incorrect number will not be allowed by our members as it relates to your implementation of towboat policy moving forward. Again , please refer to our towboat comments that were most recently submitted.

We look forward to being a part of discussions on the use of fire in the plan. We understand the usefulness in using this forest management tool, but at the same time want to be a part of discussions on the appropriate policies that impact our businesses and our guests, who are the visitors of the BWCAW.

Finally, the "other" categories that are listed includes a number of topics, including the one very important to us in

the commercial outfitter and guide operations. While we understand the need for managing the forest effectively in this regard, we also want to be sure to note to take into consideration that the healthy management of the area can be very much increased by partnering with businesses such as ours. An example is the user education provided by our members. Permit quotas and reservation systems are also very important to our members and we would hope to be part of the discussions on how to go forward in a way that is inclusive of the diverse customer base we serve and to the healthy outfitting community that serves them.

Again, the Ely Outfitters association looks forward to commenting further as this process progresses and are eager to share our members vast amount of knowledge of the area to provide for continued use of this wilderness by our customers.