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Comments: The 1.1 million-acre BWCAW is the largest Wilderness east of the Rockies and north of Florida's Everglades. It has over 1,000 lakes, connected by portage trails, rivers, and streams, and stretches for almost 150 miles along the international border. The BWCAW is one of the most highly-visited Wildernesses in the entire National Wilderness Preservation System, where about 150,000 people come every year from all over the world to paddle its lakes and fish its waters. The Fernberg Road is a paved highway that travels east of the city of Ely about 15 miles before ending at Lake One. The BWCAW surrounds the Fernberg Corridor on three sides, with homes, cabins, and developments within the corridor.

While Wilderness Watch supports restoring fire to its natural role in the BWCAW ecosystem, this project goes about it in the absolute wrong way. The Forest Service has promised since the 1980s that it will allow lightning-caused fires to play their natural role in the BWCAW, but these remain hollow, broken promises. With very few exceptions, the Forest Service has continued to put out nearly all natural fires in the Wilderness over the past 40 years. And while the Forest Service claims in the new draft EA that one of the project's purposes is to allow natural fires to burn in the BWCAW, there is absolutely no analysis in the draft EA about whether, when, or how the Forest Service will allow natural fires to do this if the proposed action occurs. It appears to be yet another repetition of the same old broken promise.

Manager-ignited fires can have very different effects on a wilderness ecosystem than natural, lightning-caused fires. The ignition location is often different, the forest types that managers choose to burn are often different, and the type of fire can be very different. Managers often choose circumstances and weather conditions where they can somewhat control the burning of fires. Managers usually avoid conditions that can cause stand-replacement crown fires, which historically happened in the BWCAW, and prefer lower-intensity ground fires that primarily clear brush and burn shorter ladder fuels. Those different kinds of fires can cause widely divergent effects on the wilderness landscape. And from a wilderness perspective, manager-ignited fires are a prime example of humans imposing their will on the wilderness landscape, rather than allowing lightning-caused fires to play their role unmanipulated by human choices and the Forest Service's "desired conditions."

The proposed massive manipulation of up to 84,000 acres within the Boundary Waters Canoe Area Wilderness (BWCAW) will violate the Wilderness Act's directive to preserve the area's wildness and wilderness character. The Forest Service should instead allow natural lightning-caused fires to play their role in the BWCAW. The draft EA totally fails to analyze whether, when, or how the Forest Service will allow natural fires to burn in the BWCAW if the proposed action proceeds.

I support Alternative 3, the alternative that calls for No Action in the Wilderness.