

Data Submitted (UTC 11): 2/14/2025 2:53:58 PM

First name: Christopher

Last name: Lish

Organization:

Title:

Comments: Friday, February 14, 2025

Superior National Forest

8901 Grand Ave Place

Duluth, MN 55808

Subject: Select Alternative 3 -- Fernberg Corridor Landscape Management Project #65214

To Superior National Forest Supervisor Thomas Hall and Kawishiwi Ranger District Ranger Aaron Kania:

I strongly urge the U.S. Forest Service to reject the proposal for a massive manipulation project that would set fire to as many as 84,000 acres of the Boundary Waters Canoe Area Wilderness (BWCAW) in Minnesota. I support Alternative 3, the alternative that calls for No Action in the Wilderness.

In January, the Forest Service released a draft Environmental Assessment (EA) for the Fernberg Corridor Landscape Management Project. The most alarming part of the project is the Forest Service's proposal to ignite fires on and burn up to 84,000 acres of the Wilderness. This includes going as far as five or six miles east into the BWCAW from the end of the Fernberg Road Corridor, to burn as far into the Wilderness as Ima Lake, Lake Four, and Hudson Lake.

This misguided and massive manipulation project has no place in Wilderness and would violate the mandate of the 1964 Wilderness Act to preserve the area's wildness, its wilderness character. In addition, the agency's plan could include using helicopters and chainsaws, another violation of the letter and spirit of the law.

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.

While I support restoring fire to its natural role in the BWCAW ecosystem, this project goes about it in the 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 with very few exceptions, the Forest Service has continued to put out nearly all natural fires in the Wilderness over the past 40 years. 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 Forest Service should allow natural lightning-caused fires to play their role in the BWCAW. Disappointingly, the draft Environmental Assessment fails to analyze whether, when, or how the Forest Service will allow natural

fires to burn in the BWCAW if the proposed action proceeds.

Please select Alternative 3, the alternative that calls for No Action in the Wilderness.

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,  
Christopher Lish  
San Rafael, CA