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First name: Chris
Last name: Knopf
Organization:
Title:
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Friends of the Boundary Waters Wilderness Comments
February 14, 2025

Thank you for the opportunity to comment. Friends of the Boundary Waters Wilderness (hereafter "Friends") has been working and advocating for protection of the Boundary Waters for nearly 50 years and is looking forward to at least another 50 years of fulfilling its mission. A nonprofit organization, Friends has more than 7500 members who love the Boundary Waters and are committed to its protection. Our more recent efforts include purchase of significant parcels of property just outside the Boundary Waters, on Snowbank Lake and along the South Kawishiwi River; both are within the Fernberg Corridor. Purchase of these properties enables us to essentially extend the Superior National Forest, lessening forest fragmentation, protecting shoreline habitat, and maintaining wildlife corridors. We offer these comments, in furtherance of our mission.

Friends supports Alternative 2 as the best alternative, which includes careful re-introduction of fire into the Boundary Waters, allowing fire to play its natural role within the wilderness. Historically, fire has been a naturally occurring event in the Boundary Waters Wilderness that helped to naturally suppress build-up of brush and other fuels. Friends is on record acknowledging that prescribed burns are a tool to maintain a healthy boreal forest that is fire-dependent. By following a "hands-off" approach to fuel reduction since enactment of the Wilderness Act, we inadvertently have caused a greater risk of wildfire, even catastrophic wildfire. In other words, we humans have made the wilderness's vulnerability to wildfire greater-essentially a man-made, unnatural condition of high fire risk. This risk grows greater with every passing year, as balsam fir and other extremely flammable fuel continues to accumulate. In addition, climate change is increasing dry/drought periods, further exacerbating fire danger. We now have a build-up of fuel that poses an increasing risk of major conflagrations in the Boundary Waters. Ignoring it will only make the risk greater, and greater damage within the wilderness more likely. Friends supports allowing controlled/managed burns within the wilderness to correct the current imbalance and restore the forest to what it otherwise naturally would have been.

It is important to recognize that, if the No Action alternative or Alternative 3 were to be adopted, wildfire WILL occur within the wilderness, and suppression to protect people within the wilderness and values adjacent to the wilderness will likely need to be more aggressive to be successful. Conditions will be more dangerous for firefighters and other emergency personnel. Suppression tactics necessary to address more severe fires, such as mechanized tools and motorized access, will cause greater trammeling and destruction within the wilderness. And the likelihood of larger, even catastrophic wildfire will only grow greater. Friends recognizes that some of the management actions envisioned in Alternative 2 (such as mechanical treatment, temporary roads, and low intensity prescribed burns) will cause short-term adverse effects to wilderness qualities, but these are less severe than what wildfire suppression actions would cause, and are outweighed by the many resulting long-term benefits.

Among the long-term benefits that Friends seeks are increased resiliency of the forest, decreased severity and magnitude of wildfires, and a more diverse, productive, and healthy ecosystem. Essentially, a healthier forest will emerge, more able to withstand lightning-caused fires, resist insects and diseases, and adapt to the effects of climate change. For at least some species (e.g. moose), habitat will improve most with Alternative 2.

To be sure, Alternative 3 would achieve some of these benefits, but only in part. The greater scale of a healthier forest, increased resiliency, improved wildlife habitat, etc., might best be achieved through Alternative 2.

Friends commends the Forest Service for listening to comments raised during the scoping phase, and for the thoughtful and careful approach laid out in Alternative 2. Initial steps to address fuel reduction outside of the wilderness will not only lessen the danger of fire spreading when prescribed burns are eventually undertaken within the wilderness, but also alteration, or refinement of techniques in the first years can lead to improved practices that will be used when burns are undertaken within the wilderness. We recognize that the Forest Service hopes that prescribed burning within the wilderness will only need to be done on a total of approximately 26,000 acres, and unit-by-unit rather than all at once. Natural features such as lakes, streams, and wetlands will help with containment. The Forest Service's approach prudently allows a contingency of up to 57,000 additional acres to be engaged, but only if needed for containment.

Using a "flexible tool box" that can adapt to changing conditions encountered during implementation makes sense, but it is understandable that people may have some anxiety about exactly what this will mean. Friends encourages the Forest Service to provide periodic updates and allow public visibility and input into what adaptations are contemplated as changes are encountered.

Friends is pleased to see that the Forest Service has been engaging with Native Nations and is in ongoing dialogue with the Fond du Lac Band of Lake Superior Chippewa, Bois Forte Band of Chippewa, Grand Portage Band of Lake Superior Chippewa, and the 1854 Treaty Authority in this endeavor. We have much to learn from Indigenous practices regarding fire within the wilderness. We encourage the Forest Service to consult with the tribes in all stages of the implementation. More generally, we trust that this dialogue will continue for the foreseeable future.

Friends also sees great potential with the North Country Trail proposal, anticipating enhanced public recreational activity along its route. Friends sees the potential to partner with people and organizations involved as this project progresses to assist or complement their activities.

One considerable issue is how decisions will be made if the funding is not sufficient to accomplish all the actions envisioned in the plan. Will there be periodic information regarding funding status and opportunity for public input? Will certain areas and actions be prioritized over others?

Overall, both as a staunch protector of the Boundary Waters and as a landowner within the Fernberg Corridor, Friends considers Alternative 2 to be of greatest long-term benefit. Of course, many questions remain, but many of these will only be answerable over time. Friends looks forward to continued opportunities to work with the Forest Service as it implements management activity in the Fernberg Corridor as well as in its other endeavors.