

Data Submitted (UTC 11): 2/14/2025 4:57:13 PM

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Comments: Comments on the Draft Environmental Assessment for the Fernberg Corridor Landscape Management Project.

Thank you for the opportunity to comment on the Draft Environmental Assessment (EA) for the Fernberg Corridor Landscape Management Project (the project). I have been a resident and a landowner in Lake County, the location on the Superior National Forest where the project is proposed, for 45 years. As a landowner, I have been actively engaged with Firewise and forest restoration activities on our land, including burning. I have also worked as a professional wildlife biologist, landscape ecologist and plant ecologist, conducting field surveys and promoting the conservation of biodiversity and landscape function, including within the BWCAW and on public and private lands in northern Minnesota. During my career, I have worked on prescribed burn crews and fought wildfires. Lately, I have been reviewing recent literature on fire ecology and management, and the challenges of restoring beneficial fire (cultural burning, variable intensity prescribed fire and wildfire managed for resource benefit) in fire-adapted landscapes, particularly in a time of extreme fire events and climate change. I offer comments and associated references in the spirit of collaboration and community involvement. We are all in this together.

I support prescribed burning as a means to reduce the risks of extreme, high severity fire events to public health, safety and property, restore historic fire regimes and create climate resiliency in fire-adapted landscapes. However, it must be coupled with comprehensive monitoring and adaptive management strategies that are transparent and integral to planning and implementation, in order to effectively restore ecosystem function to this landscape.

Below are comments specific to the project that, if addressed, would increase my confidence in supporting Alternative 2.

Actively engage in co-stewardship with Tribal Nations. Elaborate in the EA just how the project actively engages in co-stewardship with the Grand Portage Band of Lake Superior Chippewa, Fond du Lac Band of Lake Superior Chippewa, and the Bois Forte Band of Chippewa. Tribal signatories of the Memorandum of Understanding (MOU) regarding Tribal-USDA Forest Service Relations, Co-Stewardship, and Protection of [1854] Treaty-Reserved Rights within Superior National Forest (USDA Forest Service et al. 2023). Examples include, increase Tribal access to prescribed burn training and seek Tribal participation in the development of instruction specific to Indigenous burning practices.

"The Parties acknowledge and agree that protection of the Tribes' Treaty Reserved Rights is achieved through incorporation of tribal priorities into management conditions, standards, and guidelines for Superior National Forest. To facilitate this goal, the Tribes may collectively designate management priorities that support and promote the Tribes' exercise of their Treaty-Reserved Rights ('Tribal Resource Management Priorities'), including, prescribed fire management priorities that prioritize wildlife habitat, fisheries habitat, tree species, and plants and vegetation that are culturally important." (USDA Forest Service et al. 2023).

Explain how the barriers that hinder the ability to accomplish the prescribed burning proposed, and long-term monitoring necessary, will be overcome to successfully implement the project. Many of these barriers not only impact the proposed prescribed burning in the project in the short term, but also impact the ability to maintain an effective, long-term prescribed burning program for the duration of the project and beyond. Some of the barriers include the lack of a dedicated prescribed burn work force with permanent full-time employees and stable funding, lack of acknowledgement of supportive and courageous leaders, and a clear liability policy.

For additional details see: Center for Public Lands, Western Colorado University and Aldo Leopold Wilderness Research Institute, 2023. Prescribed Fire and U.S. Wilderness Areas: Barriers and Opportunities for Wilderness Fire Management in a Time of Change. USDA Forest Service.

https://www.fs.usda.gov/rm/pubs_journals/2023/rmrs_2023_wcu_alwri.pdf

Discriminate Ignition Units from Non-ignition Units. To evaluate the prescribed burning proposed in the BWCAW, it is important to know where the 26,487 acres of proposed "ignition units" and the 57,788 acres of non-ignition units are located. Neither the map nor the legend clearly discriminates these units.

Explain how the project will both interpret and monitor the effects of the interactions between monitoring the "Natural" and "Untrammeled" Qualities of Wilderness Character.

By definition, actions that intentionally manipulate or control ecological systems within wilderness affect the "Untrammeled" Quality of Wilderness Character. Currently, prescribed burning in wilderness is considered a "trammeling" event when monitoring the 5 qualities of wilderness character. Actions taken inside wilderness or from external forces on wilderness ecosystems, regardless of whether the effects are intentional or not, affects the "Natural Quality" of Wilderness Character.

One of the objectives of the proposed prescribed burning is to enable lightning-ignited fire to burn, thereby playing its natural role in restoring the historic fire regimes and climate resiliency in the BWCAW. This is effectively "untrammeling" the wilderness and enhancing the Natural Quality of Wilderness Character. Elaborate on this effect and include in your analysis, the role of the prescribed burning proposed in the BWCAW in "untrammeling" the more than 100 years of past fire exclusion (fire suppression and the outlawing of cultural burning), thereby restoring the "natural" quality of wilderness character in the BWCAW. Although most of this "trammeling" took place before the Wilderness Act of 1964 and therefore is currently not considered in monitoring the "untrammeled" or "natural" Qualities of Wilderness Character, these actions have contributed greatly to the vegetation conditions that exist today and the purpose and need for the prescribed burning proposed in the project.

Include site-specific fire and vegetation monitoring plans in the project EA. Appendix G: Monitoring Plan (under G. Prescribed Burning) is inadequate, especially in explaining how fuels reduction, vegetation management, and wildlife habitat maintenance objectives within prescribed burn units will be monitored after the fire and over relevant time scales. According the Superior National Forest Land and Management Plan, "The Forest Service will analyze and assess planned ignitions in the Wilderness. Monitoring assesses whether the project was implemented as designed and if the project's implementation direction was effective in protecting natural resources and their beneficial uses. (USDA Forest Service, Superior National Forest. 2004).

To determine just how effectively fire management objectives are being met requires standardized, high quality, field-based, fire-effects data based on a monitoring protocol such as that instituted by the National Park Service, in their Fire Monitoring Handbook (USDI NPS 2003). Identifying suitable fire management objectives and implementing a monitoring system that measures the degree to which these objectives are being met is crucial to detecting trends and resolving critical research questions associated with the ecological goals of restoring historic fire regimes.

For additional details see: USDI National Park Service. 2003. Fire monitoring handbook. Fire Management Program Center, National Interagency Fire Center, Boise (ID) (274 p.) <https://www.nps.gov/orgs/1965/upload/fire-effects-monitoring-handbook.pdf>

Provide monitoring plans and reports including, the Forest Monitoring and Evaluation Report (Forest M&E), site specific prescribed burn plans, fire monitoring plans, and long-term monitoring plans, among others. Note: The link to the most recent M&E report, referred to in the project EA, is broken.

Describe and expand on the role of the "Wilderness Resource Advisor" to review and provide adaptive management recommendations for all monitoring plans associated with the project.

"BWCAW management direction also identifies that the Forest will monitor fires to better predict fire behavior of wildfires and prescribed fires, monitor post-fire effects to the BWCAW ecosystem in order to ensure that the objectives of the prescribed fire program are being met, determine the social reaction to and acceptance of the prescribed fire program both during and after a fire, and develop models that would address high fuel load areas and prescribed fire effects on plant communities. A wilderness resource advisor will monitor use of the minimum tool and tactics during all operations and reference the minimum requirement analysis written for the project." (USDA Forest Service, Superior National Forest. 2004).

Explain how each of the proposed treatments within the project area addresses the disturbance dilution effects of fragmentation, especially those adjacent to the BWCAW. Frelich, in his 2017 paper, "Wildland fire: Understanding and maintaining an ecological baseline", summarizes the current conditions in the project area and surrounding fire-adapted landscape. To stop the cycle Frelich describes below, all proposed treatments within the project area should be designed to reduce this effect.

"After road building and conversion of conifer forests to aspen and birch outside the wilderness in the early 1900s, the only fires that occurred within the wilderness were also ignited within. Disturbance dilution effects of fragmentation combined with direct suppression of ignitions within the wilderness increased the mean fire return intervals from 50 to 100 years during the 1700s and 1800s to about 2000 years from 1910 to 1987, leading to expansion of late-successional spruce and fir forest at the expense of the original pine-dominated landscape mosaic [12]. Over time, the natural fire mosaic of a large wildland can change and gradually disappear due to the disturbance dilution effect of fragmentation" (Frelich 2017:195)

For additional details see: Frelich, L.E. 2017. Wildland fire: Understanding and maintaining an ecological baseline. *Current Forestry Reports* 3: 188-201. <https://link.springer.com/article/10.1007/s40725-017-0062-3>