



Minnesota Division

February 16, 2001

Mr. James Sanders
Forest Supervisor
Superior National Forest
8901 Grand Avenue Place
Duluth, MN 55808

Dear Mr. Sanders,

On behalf of the Minnesota Division of the Izaak Walton League of America, please accept the following comments on the Draft Environmental Impact Statement (DEIS) for the Boundary Waters Canoe Area Wilderness (BWCAW) Fuel Treatment. Please make our comments part of the official record.

Although the League would prefer an alternative that more specifically replicated the regime of historical fires in the BWCAW, we find the arguments made for Preferred Alternative B by the U.S. Forest Service in the DEIS, and at the public hearings, to be convincing. While this alternative focuses largely on addressing the important goals of public safety and the protection of private property outside the wilderness, it should simultaneously provide some of the ecological benefits of fire to the wilderness while maintaining a level of safety for those men and women who will be administering the prescribed burns. For these reasons we find that we can support Preferred Alternative B.

That does not mean we don't have some concerns, which we hope you will consider in the final EIS.

- **PROTECTION OF SIGNIFICANT TREES**

We, and many others, were made aware of concerns for the old cedars and pines in the region. While we fully understand that to a large degree some of these species have a natural fire resistance (even fire dependence) or are located in fire retardant areas, we also hope that the Forest Service will take measures to protect these stands. These measures might be a combination of altering the time of year fires are set, altering control lines to include protection of significant trees, or other measures with which we are quite sure the Forest Service is familiar. Similarly, it is not necessary for us to explain to the Forest Service why these trees are important, and since we have been reassured in our conversations with representatives of the agency that care will be taken, we are simply asking that the importance of these trees, and the measures to be taken to safeguard them, become a part of the final EIS, and that these measure be implemented fully.

- **RECREATIONAL FACILITIES**

We also have some concerns about how any rehabilitation of recreational trails and campsites be done and paid for, should any facilities be impacted by the prescribed fires. We understand that it is not the intention of the agency to damage these facilities unduly, however, it also seems probable that some changes will occur. Because of this, it seems appropriate that since the fires are being set not for wilderness purposes or values, but for the important goals of protecting people and property outside the wilderness, that any rehabilitation work, or replacement of latrines, etc., not come from the wilderness budget, but that the efforts and human resources needed to accomplish these measures be funded by the fire budget. Similarly, the screening and/or obliteration of control lines that might intersect established portage trails should also be

accomplished with funds and personnel from the fire budget, and not redirected out of the wilderness budget.

It is hard to visualize, based on the DEIS, what portages may look like after they are used as fire control lines. However, since portages are one of the primary interfaces between visitors and the wilderness, we urge the Forest Service to make minimal changes to these trails; to return them to their “natural” state as much as possible; to protect areas of significant beauty or with impressive trees; to consider efforts to reduce the control line’s width (after the fires) to the narrowness of the trail standards as set out in the BWCAW Management Plan; and to consider combining normal portage trail maintenance and rehabilitation with the control line rehabilitation effort to best maximize personnel and resources. Again, though we fully support the need to protect people and property outside the wilderness through the use of these fires, it is imperative and fitting that wilderness values and facilities be improved upon, whenever possible, as mitigation for changes made by setting fires for non-wilderness purposes.

In addition, we view with some skepticism the Forest Service’s decision not to take measures to protect campsites. Although because of the blowdown situation, it may indeed be in the best interest of people and the resource to burn in and around these campsites, this may not be true in all cases. Along with portage trails, campsites are the places that people most associate with the wilderness, and are the places they spend the most time. Some of these sites have been used since prehistoric times. A few may contain significant stands of trees, making them particularly attractive and popular places. Protecting campsites that will not benefit from fire seems prudent because they are an important part of the wilderness experience, and also an important “infrastructure” to the wilderness and associated outfitting industry.

Campsites also take the brunt of the use in the wilderness, leading to soil erosion and the inability for new trees or ground cover to grow. Burning them may only exacerbate these problems, especially erosion. On many lakes, relocating campsites is difficult or unlikely to occur to replace those rendered useless. Like any other “rare” resource, campsites deserve more consideration than outlined in the DEIS. While it is true that in a wildfire, these same sites may be burned, we are not contemplating wildfires in this plan, but prescribed burns during which some reasonable measures to eliminate, or control the intensity of, fires is possible. We urge the Forest Service to re-evaluate in the final EIS their plans for fires in and near campsites.

- **FIRE RETARDANT**

Although we are not familiar enough with the chemical properties of retardants to offer a truly informed opinion, we share the concern of others that the relatively pristine waters of the BWCAW not become contaminated with such chemicals, nor would we wish to see any adverse impacts to soils, plants and wildlife. Therefore we urge the Forest Service to make minimal use of these chemicals, and to use water whenever it provides both the desired outcome for the fire, while meeting the needs for the safety of people, both working the control lines, and living adjacent to the wilderness.

- **WILDLIFE**

We have heard from some members who are concerned about impacts to wildlife. Although the DEIS did address in detail the impacts to threatened or endangered species, for some people it did not adequately address impacts to more common species. While we understand that the wildlife of the canoe country did indeed evolve in an environment largely shaped by fire, fire has been suppressed in that area for nearly a century. Thus, while it seems unlikely that these species would be impacted by the fires to the point of extirpation, certainly some changes in the size of populations of species now thriving (or suffering) because of the lack of fire, or movements of these populations, can be expected.

For instance, what might one expect to happen to populations of ruffed grouse, spruce grouse, moose or white-tailed deer? These valued species were mentioned largely in passing, either as they related to the gray wolf (as prey), or as associated with habitat types. But these species also

provide recreational value, even within the wilderness, because they are important game species. Though we would not suggest that focus on rare species is inappropriate – and in fact applaud it – we are concerned that the impacts to these species weren't more thoroughly studied, or at least discussed, in the DEIS. Although we understand the “two-edged sword” the agency faces in making decisions on these prescribed burns, it would be illuminating to learn how these species might be impacted by fires in the spring (nesting or calving season), in fall (rutting or dispersing season) or how recreational hunting for them might be impacted by fires in the autumn. Obviously, the fires must be set at some time of the year, and some kind of recreation, or some species, will be impacted. But while other species and kinds of recreational activities seem thoroughly discussed in the DEIS, discussions on game species and recreation associated with them are nil.

There was also little discussion that we could find on the potential impacts of prescribed burns to upland nesting waterfowl. Black ducks, in particular, are a species of concern as their numbers have dwindled across their range. The BWCAW constitutes some of the western-most habitat for this troubled species. What impacts, if any, will the fires have on the black duck, either by nest losses, or alteration of habitat that may attract mallards, which tend to hybridize with or out-compete them?

Although it is possible that the prescribed burns will have little impact on the species just mentioned, or might conceivably enhance habitat for them, one certainly wouldn't know which scenarios are likely or possible by reading the DEIS. We are concerned that this could indicate that little, or no, impact evaluation took place for these species.

- **MECHANIZED EQUIPMENT, CHEMICALS, AND FACILITIES**

The DEIS indicates the Forest Service will take seriously its charge to minimize the use of mechanized equipment, to protect sensitive resources, to repair or rehabilitate control lines, helipads, and the like, and to control toxic substances (fuel, etc.). We commend this planning, and expect the agency to be stringent in application of protective measures, in the clean-up of unforeseen accidents, and restoration of sites after-the-events.

- **PERMITS AND QUOTAS**

Recreational activities will indeed be impacted, which the DEIS thoroughly discusses. Since most fires will be set during periods of low use, it seems unlikely that there will be pressure to compensate for closures in one area with increases in permits in unaffected portions. However, should such pressure arise, the League would look with disfavor on increasing quotas because it would impact the wilderness experience in those areas.

While autumn is a time of low general use, it is a time of particularly focused use. For instance, both grouse and duck hunters visit the canoe country in September and October, and the BWCAW offers some of the only moose hunting in a wilderness setting in the lower 48 states. While we are not advocating that this use take precedence over the opportunity to set a prescribed fire when conditions become optimal, we do urge the agency to take measure to inform the hunting public of its plans.

In particular, moose hunters need to be a group of special concern. Getting a moose license is essentially a once in a lifetime opportunity for Minnesotans. Hunting moose in the BWCAW requires long range planning and scouting. Loss of opportunity for a moose hunter is not as easily replaced (there is no “next time”), nor is it as simple for them to move to a different entry point as it is for a recreational canoeist because that area may offer limited hunting opportunities, or be unscouted, or is outside the moose hunting zone specified in their license (hunters are given a moose permit for a prescribed zone – they can not hunt outside of it).

Although the Minnesota Department of Natural Resources' Division of Forestry will no doubt be a part of any prescribed burns that take place, we urge the Forest Service to also work with the Division of Wildlife to inform hunters of plans well in advance. Moose hunters applying for a

permit through the DNR drawing process should, for instance, be forewarned during the application process that their access could be affected, and therefore wish to apply for a zone outside of the BWCAW, or in a portion for which prescribed burns are not planned. Some device should also be in place to allow hunters to modify their plans should they be assigned a BWCAW moose zone in which prescribed burns take place. This will require close coordination with the MN DNR.

In closing, we would also like to urge the Forest Service to begin now to plan for reseedling or replanting of pine in the BWCAW. We understand that this can not be a part of this EIS, nor are we advocating that it be so, but do wish to point out that we have an opportunity during the next decade to right some wrongs and help re-establish native trees sorely troubled.

Although some might argue that actively re-establishing pines is too much intervention in the wilderness, the prescribed fires themselves represent intervention in the wilderness of the highest degree. Though we are not saying that these fires aren't warranted or desirable, and we strongly support the goals of protecting people, their homes, and their businesses on the edge of the wilderness (the primary reasons for the prescribed burns), this high level of manipulation is being done for non-wilderness purposes. It then seems only appropriate that we should take the opportunity to do some good for the forests of the wilderness.

The Forest Service is well aware of the damage that occurred to the regeneration of pine during the slash fires that followed the early logging operations in the BWCAW. The agency is also well aware of the deleterious impacts to the ecosystem by suppressing fires for many decades. The agency also is a leader in supporting the reintroduction, or management of, threatened or endangered wildlife. We would suggest that such practices, applied to returning native plants (trees) to their former glory is just as appropriate and need be no more invasive. If the fires do their job, conditions will be ripe to encourage pines through measures as innocuous as aerial seeding or hand planting. It is our hope that the Forest Service would begin planning now for such restoration efforts. The opportunity to restore the pineries of the Boundary Waters may never come again, and should not be squandered.

Thank you for the opportunity to comment on the DEIS. We look forward to seeing the final plan, and to working with the U.S. Forest Service to insure good results for both people and the wilderness.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Furtman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael Furtman
For the Minnesota Division
Izaak Walton League of America

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