



WILDERNESS WATCH

Keeping Wilderness Wild

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October 9, 2019

Superior National Forest
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Submitted Electronically to: lee.stewart@usda.gov

RE: Draft Recreational Commercial Services Public Comment

Wilderness Watch submits these comments as part of the public participation process for the Draft Recreational Commercial Services Needs Assessment (“Draft Needs Assessment” or “DNA”) for the Superior National Forest.

In its May 8, 2017 Settlement Agreement, the Forest Service agreed:

“to prepare a recreational commercial services needs assessment, as contemplated by 16 U.S.C. 1133(d)(5), and considering public input, to determine whether commercial services are necessary in the Boundary Waters Canoe Area Wilderness, and if deemed necessary, to determine the extent to which they are necessary. Specifically, in part, the needs assessment will address whether and, if so, to what extent, commercial towboats are needed for activities that are proper for realizing the recreational and other wilderness purposes of the BWCAW. This determination will necessarily include, among other things, ascertaining the current amount of actual towboat use in the BWCAW, and considering whether other opportunities for Wilderness access are sufficient in light of the potential impact of towboat use on Wilderness character. Defendants anticipate that they will complete the recreational commercial services needs assessment within 18-24 months, and agree that they will complete it no later than 30 months, from the effective date of this agreement.”

The Draft Needs Assessment presented for public input is much broader in scope than that described in the Settlement Agreement, and it does not address whether commercial services, and towboat services in particular, are necessary in the BWCAW, and if they are, the extent to which they are necessary. It likewise does not consider whether other opportunities

for Wilderness access are sufficient in light of the impact of towboat use on Wilderness character. Instead, the Needs Assessment is expressly limited to cataloguing current and past conditions, including “the range of recreation opportunities for the area based on recreation supply and demand, current outfitting and guiding activities, agency objectives that a recreational commercial service can assist in achieving, congressional designated area management objectives, and current non-commercial opportunities.” DNA at 1; *see also* Attachment 1¹ (Forest webpage noting, “The Needs Assessment is a technical analysis that describes the types and levels of Recreational Commercial Services currently offered to the public on the Forest by commercial enterprises [and] is based on the existing condition (services currently offered)”). It appears, though is not clear, that a necessity analysis will come at a later date, possibly as part of the “capacity analysis” and “allocation” process. *See id.* It is not clear whether such an assessment—as contemplated by the Settlement Agreement and required by the Wilderness Act—will be complete by November 2019. A specialized finding of necessity is required for continued commercial permitting. *High Sierra Hikers Ass’n v. U.S. Dept. Of Interior*, 848 F.Supp.2d 1036, 1047 (N.D.Cal. 2012) (citing *High Sierra Hikers Ass’n v. Blackwell*, 390 F.3d 630, 647-48 (9th Cir. 2004) (“[T]he fact that the [agency] has committed to forego authorizing new types of commercial activities until after the [needs assessment] is inadequate”—the continuation of existing commercial uses requires a necessity finding).

A National Environmental Policy Act (“NEPA”) analysis that considers the direct, indirect, and cumulative impacts of commercial permitting in Wilderness, as well as alternatives to that permitting, is also required. *See High Sierra Hikers Ass’n v. Blackwell*, 390 F.3d 630, 640 (9th Cir. 2004). An informal public survey does not satisfy this requirement. Many of Wilderness Watch’s members have responded to the Forest Service’s feedback request by completing or otherwise addressing the questions in the Public Comment Worksheet. However, the Worksheet is difficult to complete (requiring the user to print, fill-out, scan and email or snail-mail the Worksheet), and the questions are heavily biased toward continuing or increasing commercial services in the Wilderness. Wilderness Watch submits these comments to address, from an organizational standpoint, relevant questions from that Worksheet and to provide additional information relevant to the remainder of the needs assessment process as contemplated in the Settlement Agreement, but we request formal NEPA review with a full opportunity for public review and comment.

Wilderness Watch is a non-profit conservation organization headquartered in Missoula, Montana with offices in Idaho and Minnesota. Wilderness Watch’s mission is the preservation and proper stewardship of lands and rivers in the National Wilderness Preservation System and the National Wild and Scenic Rivers System, including protecting wildlife and ecosystems in their natural, untrammeled state. Wilderness Watch has a long history of advocacy to preserve the wilderness character of the BWCAW. Many of our staff, members, and supporters value and enjoy the BWCAW for its expansive lake and stream complex, diverse wildlife, and opportunities for solitude and primitive forms of recreation, including unique opportunities for non-motorized, water-based travel. However, these wilderness values are increasingly degraded and threatened by the proliferation of unnecessary commercial towboat use, which has turned many Wilderness entry-points and travel routes into busy motorways. While motorboat use degrades wilderness character wherever it is encountered, areas like Moose Lake, where commercial towboat use is

¹ U.S. Dept. of Ag., Forest Service, Superior National Forest, Event/Commercial Permits, <https://www.fs.usda.gov/main/superior/passes-permits/event-commercial> (last visited Oct. 9, 2019).

particularly excessive, suffer from motorized bottlenecks with towboats buzzing back and forth at persistent intervals. During a trip to the Moose Lake entry-point, Wilderness Watch staff were told by an outfitter that Wilderness visitors who would not otherwise consider a motorized tow often take a tow because paddling through motorized use areas is so unpleasant. This exacerbates the problem.

Making matters worse, it appears that commercial tow services are most often a matter of convenience rather than a matter of necessity. *See* DNA at 13 (“The guided/outfitted percentage [of use] does not include towboat services, which are not typically considered by visitors or the forest to be a guided or outfitted experience, but more of a water shuttle for convenience or ease.”). Convenience and ease are not Wilderness values, *see* Forest Service Manual (“FSM”) 2320.6, and in any event, Wilderness Watch has members of varying physical abilities who are able to paddle to most areas within the Wilderness without a tow. In fact, one of the farthest drop-off points for a tow (Prairie Portage) is generally a half-day paddle or less. *See* Attachment 2 at PDF pg. 3² (BWCAW visitor forum noting this is a 2-hour paddle for one paddler); Attachment 3³ (outfitter webpage noting tow services “can save you a half-day of paddling and get you into the wilderness more quickly”). And, because most visitors are traveling via canoe, camping gear and other equipment is relatively easy to transport in a boat further obviating the need for commercial packing services. Non-motorized visitors are disadvantaged in finding campsites when competing with visitors paying for commercial tow services, and their enjoyment of the Wilderness is impacted by the disruption of motors—an intrusion that most Wilderness visitors head to the Wilderness to avoid. Many locations outside of Wilderness provide for scenic commercial motorboat tours and tows—these uses are incompatible with a Wilderness experience, are unnecessary in the Boundary Waters Canoe Area Wilderness, and should be eliminated or heavily curtailed.

As more fully detailed below, the Forest Service has not made the case that commercial towboat services are necessary in the Wilderness—a mandatory prerequisite to authorizing such use. *See* 16 U.S.C. § 1133(d)(5). The Forest Service’s obligation does not end there. If the Forest Service determines that some commercial towboat use is necessary, it may only authorize such use only to the extent necessary to ensure that the preservation of wilderness character remains paramount. *See id.*; FSM 2320.2 (The Forest Service has an obligation to “[m]inimize the impact of those kinds of uses and activities generally prohibited by the Wilderness Act, but specifically excepted by the Act or subsequent legislation.”); FSM 2320.6 (“Where a choice must be made between wilderness values and visitor or any other activity, preserving the wilderness resource is the overriding value. Economy, convenience, commercial value, and comfort are not standards of management or use of wilderness.”).

The Forest Service has not made a specialized finding of necessity for commercial services in the Wilderness.

The Wilderness Act’s prohibition on commercial activity is “one of the strictest prohibitions of the Act.” *Californians for Alternatives to Toxics v. U.S. Fish and Wildlife Serv.*, 814 F.Supp.2d

² BWCA.com, message board, <https://bwca.com/index.cfm?fuseaction=forum.thread&threadId=1165248&forumID=16&confID=1> (last visited Oct. 9, 2019).

³ Voyager North Outfitters, <https://www.vnorth.com/other-services/tow-service.html> (last visited Oct. 9, 2019).

992, 1016 (E.D.Cal. 2011) (citing *Wilderness Watch v. U.S. Fish and Wildlife Serv.*, 629 F.3d 1024 at 1040 (9th Cir. 2010)). The Act provides a narrow exception to this prohibition on commercial enterprise, but only “to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.” 16 U.S.C. § 1133(d)(5). “[A] finding of necessity is a necessary, but not sufficient, ground for permitting commercial activity in a wilderness area.” *High Sierra Hikers Ass’n v. Blackwell*, 390 F.3d 630, 647 (9th Cir. 2004). The finding must be “specialized,” and “[t]he Forest Service may authorize commercial services only ‘to the extent necessary.’” *Id.* (citing 16 U.S.C. § 1133(d)(5)) (emphasis in original). Making this specialized finding of necessity requires a “comparative and qualitative analysis where [relevant] variables are considered in relation to one another and the interests at stake are weighed.” *High Sierra Hikers Ass’n v. U.S. Dept. of Interior*, 848 F.Supp.2d 1036 at 1047 (N.D.Cal. 2012).

The Forest Service has, to this point, impermissibly allowed commercial services based on commercial supply and demand. *See* DNA at 12 (“Historically, the Forest has chosen to allow outfitter-guides to determine the amount of visitors they can serve rather than limiting this use through an allocation. This may change in the future.”). The Draft Needs Assessment indicates weight will be given to commercial supply and demand going forward. *See id.* (“An indication of need can be determined from a review of the number of people these services accommodate each year.”). But, as explained below, courts have construed the “need” for commercial services narrowly and required more than a showing of supply and demand or visitor preference.

Commercial towboat use is degrading wilderness character, and the Forest Service has not made a specialized finding of necessity to justify this commercial use.

“The limitation on the Forest Service’s discretion to authorize commercial services only to ‘the extent necessary’ flows directly out of the agency’s obligation under the Wilderness Act to protect and preserve wilderness areas.” *Blackwell*, 390 F.3d at 647. Accordingly, “if an agency determines that a commercial use should trump the Act’s general policy of wilderness preservation, it has the burden of showing the court that, in balancing competing interests, it prepared the ‘requisite findings’ of necessity.” *High Sierra Hikers Ass’n v. U.S. Dept. of Interior*, 848 F. Supp. 2d at 1036 (citing *Californians for Alternatives to Toxics*, 814 F. Supp. 2d at 1017; *High Sierra Hikers Ass’n v. U.S. Forest Serv.*, 436 F. Supp. 2d 1117, 1131 (E.D. Cal. 2006) (“[W]hen there is a conflict between maintaining the primitive character of the area and between any other use . . . the general policy of maintaining the primitive character of the area must be supreme.”)). In the Draft Needs Assessment, the Forest acknowledges that “[t]he overriding constraint on commercial services . . . in wilderness, is the mandate to preserve wilderness character,” and commercial service “is compatible with all the other mandates of the Wilderness Act unless those uses degrade natural conditions or impair the wilderness character of the area.”⁴ DNA at 19.

The limited data the Forest Service has on visitor preference regarding motorboat use indicates that the public generally finds motorboat use, including commercial towboat use, detrimental to

⁴ This statement is not entirely accurate. Even commercial services deemed relatively benign by the Forest Service are limited by statute, and by the Forest Service’s own policy, to only the extent necessary. 16 U.S.C. § 1133(d)(5); FSM 2320.2 (The Forest Service has an obligation to “[m]inimize the impact of those kinds of uses and activities generally prohibited by the Wilderness Act, but specifically excepted by the Act or subsequent legislation.”)

wilderness character. In 1993, commenters on the BWCAW Environmental Impact Statement strongly disfavored commercial towboat use. Of the 268 commenters who specifically addressed towboat use, 24 wanted to see reductions in current use and 173 wanted to see commercial towboat use eliminated. DNA at 11. In 2007, a visitor survey returned 137 negative comments regarding the use of motorboats, including towboats, compared to 41 positive comments. *Id.* And, a 2013 wilderness character mapping effort found “[t]he lowest quality [wilderness character] categories are highly correlated with lakes that allow motorized use, especially those that are wilderness entry points.” *Id.*

Degradation of wilderness character due to motorboat use, including commercial towboat use, has been an issue in the Wilderness for some time. In 1988, the Forest Service expressed concern about “deteriorating wilderness conditions” due to entry-point quota use nearing and sometimes exceeding capacity. The Forest Service determined that, among other visitor use impacts, “allowing motorboat use to the maximum extent possible under the statute was ‘strain[ing] the wilderness environment and [was] tending to degrade the intended primitive and unconfined recreation experience’ of the BWCAW.” *Friends of the Boundary Waters Wilderness v. Bosworth*, 437 F.3d 815, 820 (8th Cir. 2006). To lessen impacts to wilderness character from motorized use, the Forest Service set motorboat quotas at approximately 75% of the statutory cap and restricted commercial towboat use to 1992 levels for numbers of boats, trips, current operators, and specific lakes. *Bosworth*, 437 F.3d at 820.

It is not clear from the Draft Needs Assessment what the level of commercial towboat use (trips) was in 1992 and how current use compares. The Draft Needs Assessment provides information on the total number of tows from each entry point between 2012 and 2018. *See* DNA at 14. It is not clear how the Forest is defining a “tow” in Table 2, *see* DNA at 14, or how the “total tows” relate to overall motorboat quotas, statutory caps, or 1992 levels of commercial towboat trips, *see* DNA at 13. For example, the maximum amount of motorboat day-use statutorily allowed from the Moose Lake entry point is 2,054 permits:

MOTORBOAT QUOTAS
(Maximum Use Allowed by Public Law 95-495)

Entry Point	Type of Motorboat Use	Annual Quota (Number of Permits)		
		1982-83	1984-98 ^{2/}	1999+ ^{1/}
Front Lake	All	1738	1738	1738
Fall Lake	Overnight	658	291	291
	Day Use on Fall Lk. only	1457	1457	1457
	Day Use on Basswood Lake	1206	932	932
Fourmile Portage	Overnight	129	97	97
	Day Use	993	773	773
Moose Lake	Overnight	730	558	558
	Day Use on Moose Chain only	837	695	695
	Day Use on Basswood Lake	1813	1359	1359
Snowbank Lake	Overnight	81	81	81
	Day Use	610	610	610
Farm Lake	Overnight	10	10	10
	Day Use	345	345	345
Brule Lake	Overnight	266	266 ^{2/}	0 ^{2/}
	Day Use	226	226 ^{2/}	0 ^{2/}
Seagull Lake	Overnight	134	133	38
	Day Use	594	594	137
Saganaga Lake	Overnight	388	370	370
	Day Use	2023	2023	2023
Clearwater Lake	Overnight	42	42	42
	Day Use	246	246	246
E. Bearskin Lake	Overnight	30	30	30
	Day Use on E. Bearskin Lake Only		227	227
	Day Use on Alder Lake	142	142	142

Yet, the draft needs assessment shows a steady increase in commercial towboat use from this entry point ranging from 2,020 tows in 2012 to 3,367 tows in 2018. DNA at 14.

- How does the Forest Service reconcile this level of commercial towboat use with the statutory cap, as reflected after statutory phaseouts, particularly when combined with general motorboat use?
- How does the Forest Service reconcile this level of commercial towboat use with the reductions imposed in 1992?
- How does the Forest Service justify an increasing level of commercial towboat use when crowding and motorized use, particularly at Wilderness entry-points and on the Moose Chain, are the biggest issues degrading wilderness character? See DNA at 9 – 11.
- How does the Forest Service justify this level of commercial towboat use when commercial towboat services are primary contributors to motorized bottlenecks and excessive use at Wilderness entry-points and on motorized lakes?
- How does the Forest Service justify this level of commercial towboat use when ease and convenience are the driving factors behind commercial towboat use? DNA at 13.
- How does the Forest Service justify this level of commercial towboat use when the farthest towboat drop-off point is only a half-day paddle or less and accessible via non-motorized means by most visitors of varying physical abilities?

- How does the Forest Service justify this level of commercial towboat use when opportunities for commercial, motorized travel and tows are available outside of the Wilderness?

It appears the Forest is “fail[ing] to balance the impact that that level of commercial activity [is] having on the wilderness character of the land. At worst, the Forest Service [is] elevat[ing] recreational activity over the long-term preservation of the wilderness character of the land.” *Blackwell*, 390 F.3d at 647. The Forest’s “decision to grant permits at their pre-existing [or increasing] levels in the face of documented damage resulting from overuse does not have rational validity.” *Id.* at 648.

The Forest Service “must reconcile the use of commercial services with what the land can tolerate while remaining wilderness, so as not to elevate recreation over longtime preservation of the wilderness character.” *High Sierra Hikers Ass’n v. Weingardt*, 521 F.Supp.2d 1065, 1075 (N.D.Cal. 2007). This is because “overuse for unnecessary purposes within the wilderness degrades the physical environment and reduces the outstanding opportunities for solitude which Congress intended wilderness areas to afford.” *Id.* Making this specialized finding of necessity requires a “comparative and qualitative analysis where the variables [actual need, impacts to wilderness character, regulatory limitations, etc.] are considered in relation to one another and the interests at stake are weighed.” *High Sierra Hikers Ass’n v. U.S. Dept. of Interior*, 848 F.Supp.2d at 1047. Courts have construed “need” narrowly in determining necessary commercial services. For example, one court found that packstock may be “necessary for certain people who cannot walk or carry necessary gear,” but “the Forest Service’s decision to count all persons with equipment too heavy or bulky to carry on foot as ‘in need of’ commercial pack services was arbitrary and capricious.” *Weingardt*, 521 F.Supp.2d at 1078. The same court found arbitrary the Forest Service’s conclusion “that [inexperienced / underequipped] persons desiring a wilderness pack trip or day ride experience need commercial services” since “this conclusion improperly equates ‘preference’ with ‘need,’ especially when such pack stock trips could be made in scenic non-wilderness.” *Id.* It also found arbitrary the Forest Service’s conclusion that “spot and dunnage trips ... generally used by people who are physically capable of hiking, but who want their gear packed in or want to go deeper into the wilderness,” were necessary. *Id.* at 1079.

Thus far, the Forest Service has not made an attempt to demonstrate or quantify the need for commercial towboat services—at all—as required by the Wilderness Act and the May 2017 Settlement Agreement. In fact, the Draft Needs Assessment indicates that the services are, generally, not needed but rather a matter of convenience.

Continued commercial towboat use at existing levels without a specialized finding of necessity is unlawful.

Authorizing the continued use of existing commercial services without a specialized finding of necessity is unlawful. The Forest’s Needs Assessment webpage indicates:

Currently, Superior National Forest managers have put a hold on processing [sic] recreational special uses permits while we complete a Recreational Commercial Services Needs Assessment (Needs Assessment). No new permits will be issued, and no new levels of services will be processed during this time.

Exceptions to this hold will be for permits that were in the process of being issued at the start of the Needs Assessment. These will continue to be processed and issued.

Attachment 1.⁵ Thus, it appears that already existing commercial services will continue. This is unlawful. Courts have “declined to differentiate, for purposes of the Wilderness Act, between an agency maintaining current levels of commercial activity and increasing such activity.” *High Sierra Hikers Ass’n v. U.S. Dept. Of Interior*, 848 F.Supp.2d 1036, 1047 (N.D.Cal. 2012) (citing *Blackwell*, 390 F.3d at 647-48). “Moreover, the fact that the [agency] has committed to forego authorizing new types of commercial activities until after the [needs assessment] is inadequate.” *Id.* The continuation of existing commercial uses requires a necessity finding. *Id.* Until such a finding is complete, the Forest Service’s continued authorization of commercial use violates the Wilderness Act, and if such a finding is not complete by November 8, 2019, the Forest Service is also in violation of the Settlement Agreement.

The issuance and renewal of commercial special use permits in wilderness requires an Environmental Impact Statement.

The Forest also indicates it will only undertake a NEPA analysis for commercial activity in Wilderness if it decides to make adjustments from the current level of commercial use. Specifically, the Forest’s commercial permit webpage states:

The information gathered by the Needs Assessment will be used to examine whether the Forest should adjust how it manages Recreational Commercial Services to protect natural resources. If there is a need for adjustment, the Forest will implement a National Environmental Policy Act (NEPA) analysis to evaluate potential changes. If initiated, the NEPA process will provide extensive opportunity for public input on how the Forest manages Recreational Commercial Services.

Attachment 1.⁶ But, it is not the change in use from existing levels that triggers the need for NEPA, it is the issuance and renewal of commercial permits at any level of use that triggers NEPA. Addressing commercial special use permits in wilderness, the Ninth Circuit held that “[t]he issuance of multi-year special-use permits to [commercial operators] constitutes major federal action that significantly affects the environment and requires the agency to prepare a detailed EIS.” *High Sierra Hikers Ass’n v. Blackwell*, 390 F.3d 630, 640 (9th Cir. 2004). It also held that “one-year renewals of the special-use permits were not allowable categorical exclusions” where “extraordinary circumstances exist which include ‘congressionally designated areas, such as *wilderness*....” *Id.* at 641 (emphasis in original).

The Forest Service must undertake a NEPA analysis, with an opportunity for public review and comment, analyzing the direct, indirect, and cumulative impacts of commercial use in the Wilderness and fully considers a range of alternatives to that use.

⁵ U.S. Dept. of Ag., Forest Service, Superior National Forest, Event/Commercial Permits, <https://www.fs.usda.gov/main/superior/passes-permits/event-commercial> (last visited Oct. 9, 2019).

⁶ U.S. Dept. of Ag., Forest Service, Superior National Forest, Event/Commercial Permits, <https://www.fs.usda.gov/main/superior/passes-permits/event-commercial> (last visited Oct. 9, 2019).

Submitted October 9, 2019,



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Attachment 1

United States Department of Agriculture
Forest Service

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Site Map

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[Contact Us](#)

Recreation Commercial Services Analysis

The Superior National Forest is examining the use of recreational commercial services provided on the Forest. To fully understand all the issues, the Forest is seeking information from the public. Learn how the Superior National Forest is addressing this topic and take part by providing direct feedback through a questionnaire or by taking part in one of two public forums in September.

- [Press Release](#)
- [Recreational Commercial Services Needs Assessment](#)
- [Needs Assessment Public Comment Worksheets](#)
- [Needs Assessment Map](#)

Event and Commercial Use Permits

Several uses on the national forest require a permit. These include:

Events

Events which involve use by a group of more than 75 people and/or a fee or collects a donation from participants require a special use permit.

Application for holding a recreation event on the Forest.

Commercial Outfitting and Guiding

Commercial Outfitting and Guiding on the national forest requires a permit. Currently, Superior National Forest managers have put a hold on processing recreational special uses permits while we complete a Recreational Commercial Services Needs Assessment (Needs Assessment). No new permits will be issued, and no new levels of services will be processed during this time.

Exceptions to this hold will be for permits that were in the process of being issued at the start of the Needs Assessment. These will continue to be processed and issued.

The Needs Assessment is a technical analysis that describes the types and levels of Recreational Commercial Services currently offered to the public on the Forest by commercial enterprises. As the Needs Assessment is based on the existing condition (services currently offered), if the Forest authorizes new business or the expansion of services by existing businesses during the analysis period, it will be necessary for the analysis to start over as there would be new information to include.

Please note that the Needs Assessment is only a mechanism to determine the types of recreational commercial services currently offered to the public on the Forest, and the levels/amounts of these services. The Needs Assessment analyzes these services and identifies their need in realizing recreational goals on the Forest, while protecting both physical and social resources.

The information gathered by the Needs Assessment will be used to examine whether the Forest should adjust how it manages Recreational Commercial Services to protect natural resources. If there is a need for adjustment, the Forest will implement a National Environmental Policy Act (NEPA) analysis to evaluate potential changes. If initiated, the NEPA process will provide extensive opportunity for public input on how the Forest manages Recreational Commercial Services.

List of Permitted Outfitter Guides - April 2018

Commercial Filming and Photography

A permit is required for all commercial filming activities on National Forest System lands, and for certain commercial still photography, except when these activities involve breaking news.

If the proposed filming or photography is located within the Wilderness, additional information may be required and additional screening will be conducted. The following information provides more details.

What is considered commercial? How to apply for a permit and what is required

Commercial filming and photography request form

Insurance requirement

Standard form 299 - Application for transportation and utility systems and facilities on federal lands.

Alerts & Warnings

Sturgeon River Trail Partial Closure
 Water will be shut off and fee season will end for most fee campgrounds

[View All Forest Alerts ...](#)

Attachment 1

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Boundary Waters Canoe Area

(https://www.facebook.com/boundarywaters) (https://plus.google.com/+Bwcaw/)

(https://twitter.com/BoundaryWaters)

(https://www.linkedin.com/groups/1796423)

(https://www.instagram.com/bwca.com/)

Chat Rooms (./chat2/index.cfm) (0 Chatting) | Search (index.cfm?fuseaction=home.searchresults) | Login/Join (index.cfm?fuseaction=forum.login&confId=1)

* For the benefit of the community, commercial posting is not allowed.

Boundary Waters Quetico Forum (index.cfm?fuseaction=forum.conference&confId=1)

Trip Planning Forum (index.cfm?fuseaction=forum.forum&forumID=16&confId=1)

First timers

Forum Sponsor



(https://clearwateroutfitters.com/blog/?utm_source=bwca&utm_campaign=forum_16&utm_content=CLEARWATER-3)

Author

Text

xraymom610

07/14/2019 12:20PM

My husband, son and I will be doing our first BWCA trip in early August. We will be putting in at EP25 going up Moose lake, through Newfound and Sucker lakes to the Prairie Portage, then on to Basswood Lake portage at Basswood-Back Bay down Lewis Narrows through Pipestone Bay, Portage Pipestone bay - Newton Lake, down Newton lake to Portage at Fall Lake- Newton Lake and exit at EP24 Fall Lake. Any information would be greatly appreciated.

We are interested in fishing, nature and wildlife viewing. The dates of are trip are 8/6 to 8/11. Should we move camp every day? Any great campsites?

Thank you!

Reply (<index.cfm?fuseaction=forum.editMessage&threadId=1165248&forumID=16&confID=1&action=replyToMessage&parentId=1165248>) Reply with Quote
(<index.cfm?fuseaction=forum.editMessage&threadId=1165248&forumID=16&confID=1&action=replyToMessage&parentId=1165248"e=1>) Print (./messageboards
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Boppasteveg



 (<index.cfm?fuseaction=photos.viewjournals&username=Boppasteveg>)

07/14/2019 04:58PM

I have not been to that area but it sounds like an overly ambitious trip...especially for your first time. It seems like a lot of water to cover in a (fairly) short period of time. Yes...you will probably need to break camp each morning and hopefully find a campsite by late afternoon.

Reply (<index.cfm?fuseaction=forum.editMessage&threadId=1165248&forumID=16&confID=1&action=replyToMessage&parentId=1165258>) Reply with Quote
(<index.cfm?fuseaction=forum.editMessage&threadId=1165248&forumID=16&confID=1&action=replyToMessage&parentId=1165258"e=1>) Print (./messageboards
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(<index.cfm?fuseaction=photos.viewjournals&username=marsonite>) 

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07/14/2019 05:31PM

I think it's a doable distance. Moose lake landing to Prairie Portage takes about two hours,. I have also camped near Basswood falls and paddled out to the Moose entry via Wind and got to the Ely Steakhouse by dinner time. So you should be able to cover that distance easily in five days. You're covering a lot of big water, so be careful with the wind. Also hopefully you are aware that most of your loop is on a motor route. Enjoy your trip!

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Bushpilot



 (<index.cfm?fuseaction=photos.viewjournals&username=Bushpilot>)

07/14/2019 05:54PM

Not sure if you know it but this whole route is on motor lakes. Just saying because some are looking for canoe only lakes.The fishing on Basswood is top notch. You could get a tow from Moose lake to Back bay. Your route would not take you through Lewis narrows. However if you have a hard time finding fish you might want to detour to Lewis narrows. If you wanted no motors you could skip Back bay on go around US point in paddle only water.

Raised by wolves!

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GraniteCliffs



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07/14/2019 05:57PM

I also assume you are aware you will have a parade of motor boats on your route, esp the first day. At that time of year the lakes on the way to Prairie are like a flotilla. The boat traffic tapers off after Prairie but is still there most of the way down Basswood. You can take a tow if you want to spend the money. Again, what some paddle in two hours can easily balloon to four hours if you have limited paddling experience. As mentioned you will be headed west on some of the biggest water around. If you have limited paddling experience you might consider an alternative route that keeps you on smaller lakes that don't have motor traffic. The upside is your route will limit how many portages you have. In any event, have a great trip!

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billconner



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07/14/2019 07:03PM

Depending on the day if the week and time of day, you will see and gear some motor traffic on Moose. Ive never found it a big deal but everyone is different. After driving 10 hours, the paddle up Moose even with sporadic motor traffic is enjoyable.

My second and fourth trips were from PP to Basswood Falls on day 1 with son - 11 first time and I was 53 - and I hope to do it again. Based on getting to BF for night 1, i don't see a problem. That entire route is around 35 miles. I figure 10-12 a day (now at 67) and you have 5 days. I'll assume 3 person canoe, which is faster usually? And your son will paddle? You have room for a layover day or two.

BUT if wind and waves are bad first day, don't try for BF. Just look fir a site not far from PP and try to head out very early second day. I suspect biggest mistake is feeling you have to stick to your plan.

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tumblehome



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07/15/2019 08:23AM

**Please clean up 100% of your camp. I'm not saying you were not planning on it but somehow, there are a lot of campers that still leave their garbage for others. Everything must go, all the way down to the twist ties. Make the camp look better than when you arrived. Thanks.
Tom**

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cyclones30



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07/15/2019 01:13PM

If you're experienced paddlers I'd say it sounds like a decent trip. There's a chance you'll see motor boats on most if not all of that route. (one of the few parts of the park that allows boats) We were on a motor lake in another part of the park and camped there a night. It's not something I want to do again anytime soon but to each their own. Big water and good fishing potential is what you'll find there.

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overthehill



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07/15/2019 01:52PM

Just allow for a day to be windbound and off the water whether new at it or not. Pack light.

Not to Hurry-Not to Worry

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2rivers



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07/15/2019 04:21PM

For the money, I would suggest a tow up to Prairie Portage. This will help you get past some of the traffic and get you to some more peaceful water. And it could give you a more relax paddle out. I have paddled moose lake numerous times and wind can really affect your paddling.

Casey McDowell Embrace the Suck



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lindylair



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07/16/2019 08:43PM

First trip? My advice is to avoid that busy route with big wind prone lakes and plenty of motorboats and take a different route that will help you capture the "essence" of the BWCA much better. Paddle or take a tow to Splash Lake and head over to Ensign. Many route options from there that don't include huge lakes and motorboats. Some beautiful country and very good fishing and a much quieter and more comfortable experience. Ensign Lake can also be very busy but you won't hear the drone of motor boats on the lake and as you head further in it will be much quieter.

Basswood is great, don't get me wrong. But for a first trip you will be adding the potential for a lot of challenge/risk due to wind and possibly not experiencing the solitude/quiet that is so much a part of the experience. If you love it up there, as you likely will, you can do the trip you are thinking of down the road after you have gained

some wilderness canoeing savvy and experience. Basswood will still be there.

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xraymom610

07/23/2019 02:35PM

Thank you, we will keep that in mind.

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xraymom610

07/23/2019 02:36PM

Great to hear. We are really looking forward to this trip. You have given us some alternatives to think about.

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xraymom610

07/23/2019 02:52PM

We definitely will clean up after ourselves and attempt to leave our camp sites cleaner

than we fine them.

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scottimm



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07/24/2019 09:02AM

lindylair: "First trip? My advice is to avoid that busy route with big wind prone lakes and plenty of motorboats and take a different route that will help you capture the "essence" of the BWCA much better. Paddle or take a tow to Splash Lake and head over to Ensign. Many route options from there that don't include huge lakes and motorboats. Some beautiful country and very good fishing and a much quieter and more comfortable experience. Ensign Lake can also be very busy but you won't hear the drone of motor boats on the lake and as you head further in it will be much quieter. "

+1 on recommending Ensign for your first trip. This was my first trip with my wife (then girlfriend). We took another group of first-timers there with our three young kids 12 years later. Taking a tow up will get you on Ensign early with a very short portage onto a beautiful lake. Set up camp or move on from there and then paddle back down through Moose. Day trips from Ensign are numerous and beautiful. Fishing can be great to decent.

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tumblehome



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07/24/2019 06:51PM

What if they get to Basswood and its like glass? Its not ALWAYS windy.
 If I was planning that trip I would do it in reverse. I always plan my trips West to east
 and south to north if I can.
 The prevailing wind is from the West and South more often then not in the summer.
 Tom

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Blatz



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07/25/2019 08:42AM

You'll have a great time. So you see a motor boat now and them. It's hardly a parade.
 Just keep an eye on the wind, wear your pfd and all will be right with the world.

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We can give you a head start if your expedition begins on one of the larger lakes in the Boundary Waters Canoe Area Wilderness. We'll carry you and your gear to a jumping-off point on one of our large tow boats. This can save you a half-day of paddling and get you into the wilderness more quickly.

****Canoe rental is required.****

Destination	Price
Moose Lake Area, Ensign Lake	\$26 per person, \$52 min.
Moose Lake Area, Birch Lake	\$28 per person, \$56 min.
Moose Lake Area, Prairie Portage	\$30 per person, \$60 min.
Moose Lake Area, Washington Island	\$112 per person, \$203 min. (tow price does not include Prairie Portage fees-\$16 per canoe/way)
Moose Lake Area, Back Bay	\$137 per person, \$258 min. (tow price does not include Prairie Portage fees-\$16 per canoe/way)
Burntside Lake, Crab Lake portage	\$23 per person, \$46 min.
Trout/Vermillion Lake	\$25 per person, \$50 min.
Lac la Croix Area, Customs (Sand Point)*	\$105 per person, 4 person min. unless grouped with

Attachment 3

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	others
Lac la Croix Area, McAree, Maligne, Bottle Lakes*	\$185 per person, 4 person min. unless grouped with others
Lac la Croix Area, Snow Bay*	\$160 per person, 4 person min. unless grouped with others
Round trip - Lac la Croix*	\$275 per person, 4 person min. unless grouped with others

Tow prices are per person & a minimum # of people (unless grouped with others).

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