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Superior National Forest
8901 Grand Avenue Place
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Submitted electronically via online comment portal

Re: Superior National Forest Towboat Management

Wilderness Watch submits these comments as part of the public participation process for the “Invitation for Public Comment on the Management of Commercial Towboat Operations” initiated by the Superior National Forest in 2023.

Wilderness Watch is a non-profit conservation organization headquartered in Missoula, Montana, with additional offices in Idaho, Minnesota and Vermont. 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 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.

On behalf of its broad membership, Wilderness Watch has engaged the Superior National Forest in litigation, more than once, due to the Forest's mismanagement of commercial towboat traffic and its decisions and inaction over the years that have led to steady increases in the volume of this non-conforming, wilderness-degrading use.¹

We emphasize at the outset of this comment that the present level of towboat traffic occurring in the Boundary Waters exceeds legal limits, and that any plan revision modifying towboat management as contemplated here must eliminate or restrict commercial towboat traffic. Any decision that leaves towboat use at present or increased levels will remain out of compliance with statutory obligations and invite legal challenge. The federal district court that is currently hearing ongoing litigation over the Forest's towboat mismanagement has acknowledged the Forest's own admission of this problem: "The Forest Service noted that '[m]onitoring shows that the overall motorized use cap is being exceeded in some areas,' and recognized that 'it is exceeding group encounter and natural resource standards, along with a lack of campsite availability, all leading to wilderness character degradation.'"² The district court also noted that "[t]he Forest Service's own documents suggest that towboat usage 'is way out of standard even for a semi-primitive motor area.'"³

For similar reasons, it would be absolutely unacceptable—and again unlawful—for any upcoming revision of towboat management policy to attempt to ratify present traffic levels or increase use through a strategy of reinventing or manipulating the process for calculating permits, trips, and other measures of towboat and motorboat traffic. The Superior National Forest is bound by statutory motorboat limits which the agency quantified in 1981.⁴ New survey responses and the self-interested claims of towboat businesses over 40 years later are not valid bases to squeeze more

¹ See *Friends of the Boundary Waters Wilderness v. Dombeck*, 164 F.3d 1115 (8th Cir. 1999); *Wilderness Watch v. Halter*, Case No. 15-cv-7374 (D. Minn.); *Wilderness Watch v. Hall*, Case No. 23-cv-284 (D. Minn.) (ongoing).

² *Wilderness Watch v. Hall*, Case No. 23-cv-284, Dkt. 46 at 8 (D. Minn. June 6, 2023).

³ *Id.* at 23.

⁴ Those limits are represented in a table reproduced in the above *Wilderness Watch v. Hall* case files at Docket # 16-1.

motorboats into the “actual annual motorboat use” figures originally quantified, and post-hoc rationalizations of how those plain numbers might be multiplied to serve additional boats and activities would be unsupported by the contemporaneous record and thus arbitrary and unlawful bases for additional or recalculated towboat permitting schemes.

Furthermore, commercial towboat permitting is governed by more than just the statutory and planning caps placed on motorboats generally. First and foremost, the Forest has a statutory obligation to protect the wilderness character of the Boundary Waters Canoe Area Wilderness.⁵ That overarching mandate controls regardless of other pressures for recreation or for serving commercial demand that the Forest may perceive, and regardless of the results of a public opinion poll about a shuttle service like the towboats. The agency cannot elevate management for recreation to the detriment of wilderness character;⁶ the law requires that the landscape being conserved (and presenting an opportunity for recreating in) is a *wilderness* landscape, and the Forest is not free to sacrifice any amount of wilderness preservation in the pursuit of recreational accommodation.

Second, towboat activity is also governed by the Wilderness Act’s ban on commercial enterprise and its narrow exception for commercial services only “to the extent necessary” for wilderness compatible purposes.⁷ This is a strict bar and sets a prerequisite for commercial service permitting that the Superior National Forest has never met. Consumer demand and necessity are not the same thing. Market-driven demand and necessity are not the same thing. Convenience and necessity are not the same thing.⁸ And the rule regarding the *extent* of necessity requires that

⁵ See 16 U.S.C. § 1133(b).

⁶ See, e.g., *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.”); *High Sierra Hikers Ass’n v. Weingardt*, 521 F.Supp.2d 1065, 1075 (N.D.Cal. 2007) (The agency “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.”).

⁷ 16 U.S.C. § 1133(c), (d)(5).

⁸ See *Weingardt*, 521 F.Supp.2d at 1079 (Finding 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,” and also finding 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).

permitting be limited to no more than that extent—a quantifiable, real limit bound by substantive, legitimate findings of actual necessity.⁹ Wilderness Watch is concerned by the framing of the present survey, which lacks acknowledgment of some important legal context and implies that the agency is not seriously intending to comply with its statutory obligations or seriously intending to meaningfully restrict towboats.

Below, we will address each of the Forest’s direct survey questions in turn. But first, we must highlight up front a few important inaccuracies or problematic omissions in the overview the Forest provided in this pre-scoping notice:

- When describing the statutory motorboat limits, the notice does not acknowledge that the law prescribes its base period use limits for “each lake,” or entry point.¹⁰ By referring only to wilderness-wide base period use, the notice elides the fact that entry-point or lake-specific limits are already being exceeded in the most congested areas, and the notice does not acknowledge that the only lawful option in such zones is to institute policies decreasing towboat use.
- The notice does not acknowledge that the reduced quota caps the Forest implemented in its Wilderness Management Plan in 1993 were derived because the Forest documented that motorboat use at the full statutory cap (or base period use) levels was “strain[ing] the wilderness environment and [was] tending to degrade the intended primitive and unconfined recreation experience.”¹¹ The language of the notice implies that the quantitative difference between the reduced quota caps and the statutory maximum is available to be allocated to towboats, without any other concerns—but this is not so. If that additional use is to the detriment of wilderness character, as the Forest has previously determined, then permitting it would thereby contravene the agency’s legal obligations for Boundary Waters administration.

⁹ See *High Sierra Hikers Ass’n v. Blackwell*, 390 F.3d 630, 646-47 (9th Cir. 2004) (“The finding of necessity required by the Act . . . must show that the number of permits granted was no more than was necessary to achieve the goals of the Act.”); *High Sierra Hikers Ass’n v. U.S. Dep’t of Interior*, 848 F. Supp. 2d 1036, 1046 (N.D. Cal. 2012) (“[I]f 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].”).

¹⁰ See Boundary Waters Canoe Area Wilderness Act § 4(f), Pub. L. 95-495, 92. Stat. 1649 (1978).

¹¹ *Friends of the Boundary Waters Wilderness v. Bosworth*, 437 F.3d 815, 820 (8th Cir. 2006).

- The notice’s discussion of its purported necessity determination is inaccurate and misleading.
 - The notice’s claim that the Forest Service, in 1993, “determined the extent to which commercial towboats were necessary and proper” is false. The 1993 planning process did no such thing—nowhere did the 1993 plan cite the “extent necessary” commercial services provision of the Wilderness Act, and nowhere did it discuss or quantify the extent of any purported need. In fact, commenters in the 1993 planning process urged the Forest to conduct a needs assessment, and that step was not taken between the draft and final plan adoption. Furthermore, the agency’s collection of public comments during that process made clear that the amount of towboat use it ultimately included in the plan went beyond even the documented public *desire* for such use, let alone the wilderness-compatible need. Less than 25% of the public who commented on the issue supported the level of towboat permitting the agency ultimately selected, and the majority of commenters who addressed the issue favored eliminating or phasing out towboats altogether.¹²
 - Nowhere does the present pre-scoping notice acknowledge or clarify that the statutory requirement pertains to the “extent” of necessity and that clear necessity-bound limits are thus prerequisite to commercial services permitting. Instead, the notice implies that the agency has already determined legitimate need-based limits and is now seeking feedback on merely implementing them. This is not so. The agency’s 2019 Commercial Services Needs Assessment explicitly punted on doing the statutorily required work on towboats,¹³ and the agency’s 2020 capacity analysis also punted and did not complete the requisite towboat analysis.¹⁴

Question 1.1: Are commercial towboat operations necessary for activities that realize the recreational or other wilderness purposes of the BWCAN? If so, what activities?

- No.

¹² See page A-49 in the appendix to the Final Environmental Impact Statement on the 1993 plan.

¹³ The recent Commercial Services Needs Assessment stated that towboats needed to be “further considered and analyzed in a capacity analysis and environmental (NEPA) analysis.” The document made clear that it was not setting enforceable needs-bound limits but was instead providing “a framework for managers to prioritize expansion and authorization of recreational commercial services where there is competitive interest and high demand.”

¹⁴ The 2020 Capacity Analysis stated plainly that “[c]ommercial towboats are not included.”

- As described above, the first and second lines of the pre-scoping notice's section on this issue are inaccurate.
- The towboat services occurring in the Boundary Waters tend to serve two types of use.
 - o First, and predominantly, they shuttle able-bodied canoers (with their canoes) further into the Boundary Waters to begin canoe-bound wilderness trips. All this does is push the trailheads and their crowding further into the backcountry; it essentially shrinks the size of the actual wilderness environment that the canoers are seeking to experience. No canoe paddler "needs" the paid-for privilege of skipping a half-day's worth of paddling to get ahead, and the fact that such canoers are going to paddle off from wherever the towboat leaves them makes abundantly clear that there was no "need" for this service in order to engage in the wilderness-compatible canoe trip they were planning all along. If folks want to take motorboat taxis around north country lakes, they can do so somewhere in the many thousands of lakes that are not within designated Wilderness, which is protected expressly from the detrimental impacts of engine traffic and commercialization.
 - o Second, some towboat passengers utilize the service in order to essentially bump their front-country camping experience further in beyond the external Wilderness boundary. After paying for the exclusive privilege to beat paddle parties across the entry lakes, these passengers then snap up campsites nearby towboat drop-off points and set up front-country-style camps with the extra material conveniences that the privilege of traveling by combustion engine allows them to tote in. All this does is degrade the Wilderness environment. Again, if folks want to take motorboat taxis to erect well-furnished campsites, they can do so outside of designated Wilderness. There is no legitimate wilderness-based "need" for this practice.
 - o Third, visitors to the Boundary Waters no more "need" motorized towboat shuttles to facilitate a wilderness trip than do visitors to the Bob Marshall Wilderness "need" ATV shuttles into the heart of the Bob Marshall to facilitate their trips. Towboats are relicts of the Boundary Waters' motorized past, before it was designated Wilderness. It's time to phase them out.
- Convenience and necessity cannot be conflated. Commercial demand and necessity cannot be conflated.

Question 1.2: At what level, if any, should commercial towboat operations be allowed so that visitors can engage in activities that realize the recreational or other wilderness purposes of the BWCAW?

- It is telling—and troubling—that the way the Forest has framed these two questions misses the point of its statutory obligation to limit commercial services to the extent necessary. By asking the public, essentially, “is there a need out there,” and then “how much should we allow,” this survey is eliding the more applicable and important question of “what exactly is the true extent of the need?” The answer to that last question governs what towboat use the agency can legally permit, and we are concerned about how it is being dodged here.
- So the answer to the above question is that towboat operations should be allowed only to the extent of true necessity. In fact, such permitting *must* be restricted to no more than that discrete limit. See our comments above regarding how necessity and convenience cannot be conflated.
- The Forest’s past practice of referring to commercial demand is an illegitimate basis for answering this question.¹⁵ As is inferring demand from public responses to this survey.
- Moreover, even if a “need” exists for tows, that does not necessarily justify *motorized* tows. For those visitors needing a tow, they could utilize a paddling or rowing service to deliver them to the places now serviced by motorized towboats.
- Young people like Girl Scout groups, or people with disabilities such as those served by organizations like Wilderness Inquiry, also do not need towboats, but come to the BWCAW prepared to paddle. Those groups, unfortunately, must now paddle miles through the BWCAW on lakes like the Moose Lake Chain before their wilderness experience can begin, due to the buzzing of noisy towboats.

Question 2.1: Should commercial towboat operations be managed differently within the Wilderness compared to general forest recreational areas outside designated wilderness? If so, how?

¹⁵ See, for example, the language in the 2019 Needs Assessment framing it as “a framework for managers to prioritize expansion and authorization of recreational commercial services where there is competitive interest and high demand.”

- The implication of this question is odd. The Wilderness Act and the Boundary Waters Canoe Area Wilderness Act impose statutory obligations on the Forest Service to manage this area and the activities within it differently than in areas outside designated Wilderness.
- To the extent the agency is asking for public suggestions here, it can only be asking whether towboats in non-wilderness areas should also be managed under the strict provisions of the Wilderness Act. The inverse—whether in-Wilderness towboat operations can be managed like elsewhere—is something the Forest has no legal authority to implement to the extent that management elsewhere fails to comply with the Wilderness Act.

Question 2.2: What are the impacts of commercial towboat use on Wilderness character?

- The Eighth Circuit Court of Appeals has made explicitly clear that “[l]imiting motorboat use is integral to preserving the wilderness values and primitive character of the area.”¹⁶
- Towboat use introduces commercialization into the wilderness experience, something that the Wilderness Act stands in direct general opposition against. The profit motives that incentivize increases in use are inherently detrimental to the Wilderness environment. The economic disparities that commercialization introduces are inherently detrimental to the egalitarian principles of preserving wilderness areas for all, free from the environmental impacts of economic development.
- Towboat and motorboat use increases crowding in the wilderness by adding capacity to wilderness entry based on the ease of traveling via engine, rather than human, power.
- The sights and incessant sounds of motors degrade the wilderness experience. Motorboats represent exactly the kind of industrialized human infrastructure that the Wilderness system is meant to stand in contrast against, and that people travel to the wilderness to experience an escape from. The Forest Service’s wilderness character monitoring protocol, Keeping it Wild 2, despite its shortcomings, recognizes that any and all motorboat use degrades an area’s wilderness character, even where the motorized use is legal.
- The use of motorboats to shorten travel times effectively shrinks the scale of the wilderness.
- The volume of motorboat traffic on the exempt lakes makes it harder for canoers to have the wilderness experience that the Boundary Waters was designated for. Canoers who seek

¹⁶ *Bosworth*, 437 F.3d at 819.

to avoid the disturbance of motorboats must seek out other entry points and abandon favored areas they once enjoyed before towboat traffic grew so thick. In a perverse set of incentives, many wilderness-loving canoers book towboat shuttles in order to quickly *escape the towboat-heavy lakes*. Canoers who do paddle on these lakes, either by choice or because they can't afford to hire a commercial service, must contend with not only the noise but also the wakes and other challenges of navigating as a paddler on motorboat-heavy waters.

Question 2.3: Are there ways to minimize impacts that commercial towboats may have on wilderness character?

- Yes. The Forest Service can eliminate or heavily restrict towboat use. Less towboat traffic means less wilderness character impact—and it really is as simple as that. Equivocating about alternative ways to have both towboats and wilderness character at the same time is an oxymoronic distraction.
- The impacts could be reduced if the towboats aren't motorized. The tows could be done with oar boats or larger paddling canoes if there is truly a need for the service.

Question 3.1: Would increasing commercial towboat operations outside of wilderness help dilute or divert impacts that may be associated with commercial towboat operations inside the wilderness? If so, how?

- Yes. But only if this is accompanied by a *decrease* in towboat operations within the Wilderness—which this question does not make clear. Increasing towboat operations outside of wilderness while leaving operations within it at present levels (or worse) will not be likely to provide any benefit to wilderness character in the Boundary Waters.

Question 3.2: Should commercial towboat operations be made more or less available in the BWCAW?

- As noted above, commercial towboat operations cannot lawfully be made more available in the BWCAW. The way that this question implies otherwise is troubling.
- Furthermore, as noted above, present levels of commercial towboat activity in the BWCAW are unlawful. Thus, the only feasible answer to this question is “less.” And the

subjective “should” in this question’s framing can do no work. Under the law, commercial towboat operations *must* be made less available in the BWCAW.

- Congress intended with the 1978 BWCAW Act to completely terminate commercial towboats after a five-year phase-out period. It’s far past time that the Forest Service follow this intent.

Questions 4.1, 4.2 and 4.3:

How should commercial towboat “use” be defined, tracked, and tallied?

How should commercial towboat use be measured for purposes of staying within the statutory cap/base period use for all motorboat use established in the 1978 BWCAW Act?

Should the Forest allocate a portion of the current day use motor quota to commercial towboat operators to prevent competition with the general public? If so, what portion?

- The fact that the Forest has apparently not answered these questions itself is damning. Crowd-sourcing the agency’s legal compliance through an open-ended questionnaire is not a legitimate approach. The Forest must adhere to an objective, legally defensible interpretation and compliance scheme.
- The 1978 Boundary Waters Canoe Area Wilderness Act required the Forest Service to quantify the “actual annual motorboat use” occurring at each lake over the statutory base period.¹⁷ In 1981, the agency quantified that actual use and published numbers, which include the total of 12,201 across all lakes applicable today and the 2,612 cap on the Moose chain applicable today.
 - o The common-sense, facially apparent reading of those numbers is that each number corresponds to a single permitted boat.
 - o Although the 1981 table used the phrase “number of permits,” nowhere have we seen any contemporaneous Forest Service records indicating that the numbers used in the 1981 “actual use” tables could be multiplied to describe tens of thousands of additional boats. Permitting schemes under later-developed planning approaches

¹⁷ See Boundary Waters Canoe Area Wilderness Act § 4(f), Pub. L. 95-495, 92. Stat. 1649 (1978).

that applied allowances for parties with multiple boats cannot be retroactively applied to inflate the “actual use” numbers calculated in the 1981 tables.¹⁸

- To count a single towboat “use” as anything other than one trip by the towboat into the wilderness and back would lead to an unworkable and indefensible contravention of statutory requirements. Please see a letter we filed in federal district court addressing the topic of the Forest Service’s needless, self-inflicted confusion and past contradictions on this topic in greater detail.¹⁹
 - o Not until the towboat traffic got out of hand as a result of the Forest’s long-standing, overly lax management approach did the agency ever consider counting towboat trips in any way other than this common-sense approach. This indicates to Wilderness Watch that all these efforts at mathematical reimagination serve more to paper over the agency’s mishandling of unfettered towboat activity than to sincerely try to establish meaningful and accurate limits.

Question 4.4: Should the Forest allocate to commercial towboat operators the difference between the statutory cap/base period use and the current combined total of day use motor quota and overnight use motor quota?

- No.

¹⁸ This is abundantly clear because to multiply the original “actual annual motorboat use” figures by 4, for example—as the Forest’s recent references to the 1993 motorboat permitting scheme imply doing—would be to assert that just under 60,000 motorboats entered the exempt lakes, on average, in 1976, 1977, or 1988. Assuming a typical five-month boating season (as the quota system does from May 1 to September 30), that would require about 400 individual motorboats to be entering the Boundary Waters *every single day* of that five-month season. On the Moose chain alone, it would require about 70 motorboats launching every single day for five straight months each of the base period years. This simply did not occur, and nothing Wilderness Watch has seen in any agency records indicates that such an egregious multiplication in traffic has any evidentiary basis.

For reference, 2020 and 2021 were banner years, with the most Boundary Waters visitors ever recorded at about 166,000, including the majority, about 100,000 of those visitors, entering via around 24,000 overnight paddle permits. (See the Forest’s “Permit and Visitor Use Report: 2017-2021”). If only a little over half of the hypothetical 60,000 base period motorboats contained two passengers (a steep unlikelihood with a documented average party size of about 4), that use itself would exceed 100,000 visitors. The Forest Service absolutely cannot credibly contend that motorboat use alone, on only exempt lakes in 1976-1978, represented an equivalent or greater level of visitation to that of the entire wilderness-wide overnight paddle use in the recent record-setting years. If the agency were to base management decisions today on such obviously erroneous revisionist mathematics, it would certainly constitute arbitrary, capricious, and unlawful action. And extensive records on wilderness administration and Boundary Waters impacts make clear that even if such numbers were applicable, the Forest would face a statutory obligation to severely reign in such a volume of motorboat traffic to protect the wilderness environment.

¹⁹ *Wilderness Watch v. Hall*, Case No. 23-cv-284, Dkt. 37 (D. Minn.) (April 18, 2023) (Plaintiff’s letter to the court).

- As noted above, the Forest Service long ago learned that the difference was damaging. The implementation of the reduced quota caps was in response to the agency’s acknowledgement that full use at the statutory limit was “strain[ing] the wilderness environment and [was] tending to degrade the intended primitive and unconfined recreation experience.” To turn around and allocate that wilderness-damaging use to towboats, as the Forest has retrofitted its too-permissive towboat management to apparently do, only constitutes a breach of the agency’s statutory obligation toward wilderness character preservation.
- Furthermore, it’s abundantly clear that the present level of towboat use is already far greater than the difference between the statutory cap and the plan quota, even though the Forest Service has already purported to be taking this approach—so we are understandably distrustful of any attempt to perpetuate this scheme. The Eighth Circuit recognized the difference between the statutory cap and the plan quota as 2,637.²⁰ About 75 towboats are currently stickered for operation in the Boundary Waters.²¹ Each of those towboats could enter the Wilderness no more than 35 times in a season in order to stay within 2,637—and we know from the agency’s monitoring data that many of the boats are taking far, far more trips than that. It’s also imperative that the Forest recognize that the statutory base period limit and the planning quota caps are defined per lake—and legal compliance with them depends upon adherence to per-lake or per-entry-point limits. Thus, for example, the statutory limit for the Moose Lake chain is 2,612. And the agency’s planning quota already allocates over 2,000 private motorboat permits to the public for entry at Moose Lake. Yet in 2018, for example, towboats made well over **3000** trips of their own from that entry point—way beyond any amount of traffic that could be squeezed into the difference between 2,612 and the private plan quota use.

Question 4.5: Given that commercial use is guided by different laws and policies than recreational use, should authorizations for motor use issued to commercial towboat operators be under the

²⁰ See *Friends of the Boundary Waters Wilderness v. Dombeck*, 164 F.3d 1115, 1121-22 (8th Cir. 1999).

²¹ See *Wilderness Watch v. Hall*, Case No. 23-cv-284, Dkt. 26 (D. Minn.) (March 17, 2023) (Declaration of Susan Catton).

same terms and conditions? For instance, should 1 towboat be allocated per permit, unlike recreational users who are allowed up to 4 boats with 1 day use motor quota visitor permit?

- We generally answered this question through our exposition above.
- Each time a towboat enters the Wilderness, traverses a lake, and returns to exit the wilderness (a “trip”) it has conducted activity equivalent to one “use.”
- The Forest’s implication that it might smuggle four boats, or more, or multiple trips, into a reconstituted definition of “use” is extremely troubling and would be an acute breach of the public’s trust and the agency’s legal obligations.

We look forward to the day when, for once, the Superior National Forest leadership stands on the side of Wilderness preservation rather than defending and promoting commercial exploitation and degradation of the irreplaceable Boundary Waters Canoe Area Wilderness.

Submitted December 21, 2023,



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