



July 3, 2002

Terry Eggum
Superior National Forest
Tofte Ranger District
PO Box 2159
Tofte, MN 55615

Dear Mr. Eggum:

On behalf of the Board of Directors and staff of the Friends of the Boundary Waters Wilderness (“Friends”), please accept the following comments on the Superior National Forest (“SNF”) Draft Trail Management Plan (“Trail Plan”).

The Friends is a nonprofit conservation organization comprised of 2,800 members from across the country. We appreciate the opportunity to share our concerns with you. After reviewing the Draft Trail Plan, the Friends would like to provide comments on the following topics: 1) relationship to other planning processes; 2) trail opportunities; 3) trail demand; 4) trail program backlog; 5) public information; 6) partnerships; and 7) easement problems.

Relationship to Other Planning Processes

The Trail Plan states that it is designed to move the trails program into operational standards and guides set in the 1986 Forest Plan. The Friends questions why Superior National Forest would tier the trail plan to a Forest Plan that is out of date and in the process of being revised. Since the Trail Plan will likely have to be updated after completion of the revised Forest Plan, it would make sense to delay action on the Trail Plan until the new Forest Plan is in place.

Trail Opportunities and Trail Demand

As part of this Trail Plan, the Friends urges the Forest Service to implement a designated routes only policy for ATVs in the Superior National Forest. Such a policy must include environmental review of all trail proposals and adequate enforcement to ensure that ATVs remain on dedicated trails.

The Friends also is concerned that the Trail Plan will result in demands for more motorized recreation. Table 2-3 (page 8) states that there are 745 miles of motorized trails and 2013 miles of non-motorized trails. We fear that this comparison might be interpreted as a need for more motorized opportunities even though we know that the entire forest is open to ATVs unless posted closed, a point which the Plan fails to mention.

Third, the “trail demand” section seems to emphasize the demand for motorized access over other types of recreation. For example, no where does the Plan mention the high demand for

wildlife viewing trails.

According to the U.S. Fish and Wildlife's 2001 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, Minnesota ranks second in the nation as a state of "wildlife watchers." The number of wildlife enthusiasts who participate in bird watching, wildlife tourism, bird feeding and wildlife photography in Minnesota has increased 53 percent over the past five years. Wildlife watchers now outnumber hunters by a factor of more than three to one. In light of these statistics, the Trail Plan should provide for the creation of wildlife viewing trails.

Trail Program Backlog

We do not believe that new trails should be built until the most pressing backlogs can be addressed. The Draft Plan indicates that the SNF Trail Program is currently experiencing an administrative backlog on 15 separate tasks and a maintenance backlog on seven separate tasks. The Friends commends the Forest Service for attempting to resolve the backlog, but we remain concerned that resolving user conflicts, management of illegal use and correction of resource damage were not designated for improvement during the next five years. As the numbers of motorized and non-motorized forest users grow, these three tasks will become increasingly important.

The Friends also believes that the program backlog could be alleviated through a wilderness volunteer program. Earlier this year, the Superior National Forest, the Friends, and other interested organizations met to gauge interest in such a program and to discuss the program's function.

During the initial meetings, it was decided that the program's mission is to organize, promote, and provide volunteer service and wilderness education on behalf of Superior National Forest to ensure resource protection and to support the mission of the Superior National Forest. The volunteer trips and schedule would be developed by the wilderness volunteer program in cooperation with SNF Districts. Each year, they would identify all potential volunteer projects; identify which ones the SNF could handle with its current volume of volunteer groups; and identify which activities would be appropriate for volunteer groups comprised of individual volunteers. Based on this information, the wilderness volunteer program would develop a schedule of volunteer trips that might last anywhere from a weekend to seven to 10 days.

Public Information

The Friends supports the Forest Service goal of improving public information on forest trails. We especially like the idea of placing accurate and up-to-date trail maps and information on the Forest Service website.

Partnerships

The Friends believes that the SNF trail program is an excellent opportunity for the Forest Service to partner with other organizations and individuals. Please see above comment about wilderness volunteer program.

Easement Problems

Increasing development of private land in and surrounding the SNF has forced a number of recent trail re-routes onto public land. The SNF should inventory trails that currently cross private land and assess the potential number of future re-routes. Such an assessment will help determine potential impacts on the forest.

Thank you for the opportunity to provide these comments on the Draft Trail Management Plan.
We look forward to receiving more information on this project as the analysis process continues.

Sincerely,

Sarah Strommen
Policy Director