



November 12, 2001

Barbara West
Superintendent
Voyageurs National Park
3131 Highway 53
International Falls, MN 56649

Dear Superintendent West:

The Friends of the Boundary Waters Wilderness has received and reviewed the August 2001 Final General Management Plan (GMP) for Voyageurs National Park. We understand that a 30-day, no-action time period exists before the record of decision is signed. We wish to submit the following comments for the record prior to that November 13th deadline.

After such a long development process, the Friends is pleased to see the plan so close to implementation. As you are aware, our organization has supported Alternative 2 throughout the process. Specifically, we strongly support the implementation of the following two measures included in Alternative 2.

I. Fixed-wing Aircraft

Commercial floatplane use should be discontinued in the park, and private floatplane use should be prohibited on all interior lakes except Mukooda.

- Regulations on fixed-wing aircraft should not be issued until an Air Tour Management Plan (AMTP) is completed for Voyageurs National Park. Such a plan is required by the National Parks Air Tour Management Act of 2000:

The Administrator, in cooperation with the Director, shall establish an air tour management plan for any national park or tribal land for which such a plan is not in effect whenever a person applies for authority to conduct a commercial air tour operation over the park.

The Act recognizes the necessity of an ATMP to protect the scenery, wildlife, and cultural resources of our national parks:

The objective of any air tour management plan shall be to develop acceptable and effective measures to mitigate or prevent the significant adverse impacts, if any, of commercial air tour operations upon the natural and cultural resources, visitor experiences, and tribal lands.

- The fixed-wing aircraft provision in Alternative 2 is consistent with the federal mediation agreement on this issue.

II. Nonmotorized Interior Lakes

Motorized use on interior lakes should be prohibited, except for Mukooda in summer and Mukooda and the Chain of Lakes Trail in winter.

- Eliminating motors on interior lakes provides opportunities for quiet and solitude, which are often so difficult to experience on the four large lakes of Voyageurs.

The Friends also wishes to voice support for the following three measures included in the Modified Proposed Action.

I. Houseboats

We support the development of a houseboat management plan and the interim limits on overnight houseboat use. Both measures are necessary to ensure that houseboat recreation is consistent with the park's purpose.

- According to the GMP, houseboat use has increased significantly over the last five years. The visual dominance of houseboats diminishes the experience of visitors who seek spectacular scenery.
- The houseboat management plan would study and regulate graywater discharge to protect high water quality of the park's lakes.

II. Snowmobile Radar Runs

We strongly support the GMP's provision to ban snowmobile radar runs in the special use zone. Radar runs, in which snowmobiles travel down an ice track at speeds in excess of 100 miles per hour, are not an appropriate use of a national park.

- Snowmobile noise is known to have a negative aesthetic effect on winter visitors who are seeking quiet and solitude. Snowmobile exhaust systems are often modified after production to enhance performance for activities such as radar races, which lead to undesirable noise levels in the vicinity.
- Radar runs damage air and water quality from the concentrated effects that unburned gasoline and oil have on fish and wildlife. Snowmobiles typically discharge unburned fuel at the rate of 1/3 gallon for every gallon consumed, most of which ends up in our lakes and rivers.
- Minnesota offers plenty of other snowmobile experiences, including 326 trails totaling 18,000 miles.

III. Educational and Outreach Programs

The Final GMP proposes an expansion of current educational programs and opportunities. We strongly support this measure as a means of increasing awareness of the park and its unique environment. The Friends would be pleased to be a partner with the National Park Service in developing new programs.

Thank you for the opportunity to provide you with these comments. We look forward to working with you as the plan is implemented.

Sincerely,

Sarah Strommen
Policy Director