Appendix J - Response to Comments

Introduction

Comments received on the Draft Environmental Impact Statement were essential in the development of the 2006 Forest Plan to manage resources on the Huron-Manistee to best meet the Forest Service's mission, legal requirements and goals of both National Environmental Policy Act and National Forest Management Act and the interests of the public as a whole.

This appendix describes the process used to analyze public comments submitted on the Draft Environmental Impact Statement and Proposed Forest Plan and develop agency responses.

As mandated by law, the Huron-Manistee National Forests established and maintained correspondence with government agencies and tribal governments throughout the revision process. Copies of comment letters received from these entities are included at the end of this appendix.

Copies of all documents referenced in this appendix are located in the official planning record, and are available upon request from the Supervisor's Office in Cadillac, Michigan.

Analysis of Public Comments

Comments on the Proposed Forest Plan and Draft Environmental Impact Statement were received by the Huron-Manistee National Forests in many forms, including letters, postcards, e-mails, faxes, telephone calls and comments made at public meetings. All comments were compiled, organized, read and analyzed with assistance from the USDA-Forest Service's ACT 2 Enterprise Team, contracted to systematically review and categorize comments into primary topics to assist the Huron-Manistee National Forests' interdisciplinary team in their organization and development of responses.

Direction:

As a federal agency, the USDA-Forest Service must follow the procedures mandated by the National Environmental Policy Act. Procedures of this Act include soliciting comment on draft Environmental Impact Statements from federal, state and local agencies, tribal governments, and interested and affected publics (40 CFR 1503.1[a]). Further, the agency is directed to "assess and consider comments, both individually and collectively" (40 CFR 1503.4[a]) and prepare a response to those concerns expressed during the comment period following the March 18, 2005 release of the Proposed Forest Plan and Draft Environmental Impact Statement.

Possible responses to comments considered include (40 CFR 1503.4[a]):

- Modify alternatives, including the proposed action.
- Develop and evaluate alternatives not previously given serious consideration by the agency.

- Supplement, improve, or modify its analyses.
- Make factual corrections.
- Explain why the comments do not warrant further agency response, citing the sources, authorities, or reasons, which support the agency's position and, if appropriate, indicate those circumstances which would trigger agency reappraisal or further response.

Comment Letter Processing:

The Huron-Manistee received about 1,650 comment letters during the formal, 3-month comment period following the March 18, 2005 release of the Proposed Forest Plan and Draft Environmental Impact Statement. Of those comments received, approximately 1,450 were submitted as part of an organized response (or 'form letter') campaign. Although several of these form letters contained identical text, each letter was treated individually. The Huron-Manistee transmitted every comment letter to the ACT 2 Enterprise Team. ACT 2 used a coding structure and a standardized application process of the coding structure to categorize and prepare comments for the Huron-Manistee. This method is effective in analyzing voluminous comment, both individually and collectively, as required by the National Environmental Policy Act.

Using this coding structure, comments were transcribed into a database to allow the creation of subsequent queries and reports. ACT 2 utilized the following process:

- Each comment author or "respondent" was assigned a unique tracking number. All respondents were linked to their individual comments through this number in the database. Information pertaining specifically to the respondent, such as their address and organizational affiliation, was also recorded.
- Each comment letter was assigned a unique tracking number. All comment letters are linked to the respondent through this number in the database.
- ACT 2 staff identified distinct comments within each letter relating to a particular concern, resource consideration, or proposed management action.
- The distinct comments, identified by comment letter number, were placed in a separate document in the database. Those comments sharing similar concerns, questions, and/or suggestions for a topic (i.e., aspen management, motorized recreation) were grouped together.

The database prepared by ACT 2, as well as a list of comments, by respondent number, is available for public review in the planning record.

Content Analysis:

Each comment letter was read in its entirety, with the primary topic(s) identified. Comments were grouped by similar concerns and further refined to eliminate redundancy. Public concern statements were then written to represent the concerns.

Content analysis involves not only identifying each action or change requested by a respondent, but also the reason(s) behind each request in order to capture the full argument of each comment. Therefore, paragraphs within a comment letter may be divided into several comments because

multiple arguments are presented. Alternatively, several paragraphs that form one, coherent statement may be identified as a complete argument.

Public Concern Statements:

A portion of the content analysis process involved developing summary statements representing public comments. The Huron-Manistee staff identified issues and developed public comment statements to summarize comments representing similar issues, arguments or positions. The interdisciplinary team determined whether comments were substantive and within the scope of the revision process. Substantive comments within the scope of revision assisted the interdisciplinary team to further determine whether refinement to management direction, alternatives, supporting analysis, or other plan elements was needed. More detailed information regarding substantive comments and scope are presented in the following sections.

Each public comment statement was developed to capture the action that one or more members of the public believed the Responsible Official should take, and often includes the basis for this request.

Because each comment statement is a summary, it can represent one or many comments, depending on the actual comments submitted. Comment statements range from extremely broad generalities to extremely specific points because they reflect the content of verbatim public comments. In the interest of space limitations for publication of this volume, the verbatim comments are not presented, but are represented only by the public concern statement.

Public concern statements are not intended to replace actual comment letters or sample quotes. Rather, they help guide reviewers to comments on the specific topic in which they may be interested. They also allow the systematic response to large numbers of comments through the grouping process. It is important to note that during the process of identifying concerns, all comments have been treated equally—they are not weighted by organizational affiliation or status of respondents, and it does not matter if an idea was expressed by thousands of people or a single person. Emphasis is placed on the content of a comment rather than who wrote it or the number of people who agree with it. Relative depth of feeling and interest among the public can serve to provide a general context for decision-making. However, it is the appropriateness, specificity, and factual accuracy of each comment that provides the basis for modifications to planning documents and decisions. Consideration of public comment is not a vote-counting process in which the outcome is determined by the majority opinion. National Environmental Policy Act encourages all interested parties to submit comment as often as they wish.

Substantive Comments:

The National Environmental Policy Act requires the interdisciplinary team to formally respond to substantive comments. Substantive comments are defined as those that fall within the scope of the decision-making for the Forest Plan revision.

Based on the Council of Environmental Quality's regulations, a substantive comment is one that:

- Questions, with a reasonable basis, the accuracy of the information in the environmental impact statement;
- Questions, with a reasonable basis, the adequacy of environmental analysis as presented;
- Presents reasonable alternatives other than those presented in the Draft Environmental Impact Statement that meet the purpose and need of the proposed action and address significant issues; or
- Cause changes or revisions in the proposal.

Non-substantive comments, or concerns identified from them, include those that simply state a position in favor of or against an alternative, merely agree or disagree with Forest Service policy, or otherwise express an unsupported personal preference or opinion. While simple statements of opinion without a rationale were captured during the content analysis process, it is the strength of the respondent's rationale as a complete argument that provided the resource specialists of the interdisciplinary team a substantive comment to answer. Thus, simple statements of opinion have not been included in the Public Concern Statements in this appendix.

Scope of Decision:

The Council of Environmental Quality's (40 CFR 1508.25) regulations define "scope" as the range of connected, similar or cumulative actions, the alternatives and mitigation measures, and the direct, indirect or cumulative impacts to be considered in the environmental impact statement. The Huron-Manistee is required to explain why comments are determined out of scope. Generally, the types of comments received, and concerns identified, that were considered out of scope include those that:

- Do not address the purpose, need, or goals of the Forest Plan revision. Examples include comments that are not directly related to the Proposed Forest Plan or Draft Environmental Impact Statement, such as concerns pertaining to routine administrative functions.
- Offer suggestions about areas beyond the Huron-Manistee's jurisdiction.
- Request action on concerns that are addressed by federal law or national policy.
- Suggest an action not appropriate for the current level of planning, such as actions that would occur through implementation of the Forest Plan.
- Recommendations that did not consider reasonable and foreseeable negative consequences.
- Do not provide rationale for the suggestion or are statements of opinion.

Response to Comments:

Once comments were reviewed, issues identified and the public concern statements written, responses to the public concern statements were developed. Where applicable, responses include references to chapters or sections within the 2006 Forest Plan or Final EIS where more information is available. Where warranted, responses note modifications to proposed actions, additional analyses conducted, as well as clarifications and/or corrections made to the final documents in response to comments received.

Public Concern Statements

The public concern statements and the responses to these statements are presented in the remainder of this appendix. Public concern statements and accompanying responses have been grouped by resource area where possible and are numbered for agency use.

Agency Trust and Credibility:

PC#: 1
Public Concern: The Huron-Manistee National Forests employees should not be working on Saturday and Sunday.

Response: Employee work schedules are task specific and based on many factors, including workload and type of project. Forest Plan revision does not make decisions regarding employee work schedules.

PC#: 2
Public Concern: The Huron-Manistee National Forests' plan revision process should not take four to six years to complete. Forest plans should be more responsive to changing issues, and not exhaust public interest and involvement.

Response: The Huron-Manistee National Forests strived to complete the Forest Plan revision process within two years to respond to concerns associated with extended planning periods. The Forests have complied with requirements of the National Forest Management Act. Forest Plans can be amended, through a process that includes public involvement, as necessary, to adapt to changing issues or new information.

PC#: 3
Public Concern: The Huron-Manistee National Forests should extend the deadline for comments on the Draft Forest Plan and Draft Environmental Impact Statement. Large amounts of literature for each of the National Forests in Michigan have been released at the same time.

Response: The Regional Forester, while recognizing the effort to review and understand the volume and complexity of the information presented in the documents, declined to extend the comment period. It should be noted, however, that the 90-day comment period, provided for in the National Forest Management Act regulations, doubled the standard 45-day comment period required for project Environmental Impact Statements under the National Environmental Policy Act. The three Michigan Forests' planning process provided frequent opportunity for input and comment throughout the process of preparing these documents.

Allowable Sale Quantity:

PC#: 4
Public Concern: The Huron-Manistee National Forests should obtain the funding to accomplish the projected allowable sale quantity objective and achieve the desired forest condition goal.

PC#: 5
Public Concern: The Huron-Manistee National Forests should eliminate the restrictive allowable sale quantity because it drastically understates the potential harvest level.

PC#: 6
Public Concern: The Huron-Manistee National Forests should not increase the allowable sale quantity.

Response: The allowable sale quantity is not a timber harvest goal. The amount of timber harvested annually is based on a variety of factors such as budget allocations from Congress, staffing levels, and National, Regional, and Forestwide priorities. Allowable sale quantity determination is a requirement of Forest Service regulations. The allowable sale quantity, as defined in the National Forest Management Act regulations (36 CFR 219.3) is, "The quantity of timber that *may* be sold from the area of suitable land covered by the forest plan for a time period specified by the plan." The allowable sale quantity for the Selected Alternative and the revised Forest Plan is 910 million board feet per decade, or an average annual sale quantity of 91 million board feet per year. This allowable sale quantity meets the goals and objectives stated in the Notice of Intent. Vegetation diversity is the key to managing habitats for the great variety of wildlife species found on the Huron-Manistee National Forests. The revised Forest Plan provides a balance between competing concerns—such as logging operations and protection of the environment. Goals and Objectives ensure that the harvest of special forest products is within sustainable levels. Standards and Guidelines provide increased guidance for the management of these forest products, and the monitoring plan recognizes the need to monitor harvest levels to support determination of sustainable levels.

Alternatives:

PC#: 7
Public Concern: The Huron-Manistee National Forests should develop more than two action alternatives.

PC#: 8
Public Concern: The Huron-Manistee National Forests should not require the public to choose between packages of alternatives such as Alternative A, B or C. There are good aspects to all of the alternatives. The best options will not necessarily match exactly one of the alternatives as they are described. There should be an intermediate approach between these alternatives.

Response: During the initial phases of Forest Plan revision, the Forests conducted an Analysis of the Current Management Situation and several public involvement sessions to obtain Need for

Change topics. These topics were published in the Notice of Intent to Prepare an Environmental Impact Statement for Revision of Land and Resource Management Plans (2003). The Huron-Manistee National Forests received many comments from groups, government agencies, tribes, and individuals, as well as employees on the Notice of Intent. All comments, concerns, and questions received were reviewed and categorized. Based on this review and categorization, "issues" regarding the proposed management activities in the Notice of Intent were developed. An issue is defined as a point of uncertainty or debate about the social, ecological, or economic effects of the management activities being proposed.

The results from the Analysis of the Current Management Situation and comments that were received on the Need for Change and Notice of Intent indicated that the 1986 Forest Plan was still valid and needed few modifications. The 1986 Forest Plan was continuously updated and had been amended 25 times over the past 18 years. Therefore, changes needed to the 1986 Forest Plan were minimal. This translated into a small number, and correspondingly narrow, range of alternatives. The Forests determined that three alternates were sufficient to address the issues and concerns specific to the Huron-Manistee National Forests provides a clear basis for choice by the decision makers and the public.

The Final Environmental Impact Statement analyzed three alternatives with different outcomes to address Plan Revision issues. Each alternative meets the intent of relevant laws, including the Multiple-Use Sustained-Yield Act of 1960, under which the National Forests are managed. The Regional Forester considered all of the alternatives and the Record of Decision describes his rational for the Selected Alternative. Forest managers believe the Selected Alternative represents the best balance in achieving sustainable ecosystems, meeting the intent of relevant laws, and addresses the issues and concerns specific to the Huron-Manistee National Forests.

PC#: 9
Public Concern: The Huron-Manistee National Forests should adopt Alternative A, the current Forest Plan, because it is balanced and superior to Alternative B.

PC#: 10
Public Concern: The Huron-Manistee National Forests should not adopt the proposed Forest Plan because it is much too restrictive and limiting in the area of recreation.

PC#: 11
Public Concern: The Huron-Manistee National Forests should adopt Alternative B because it maintains or increases early successional habitat, is most appropriate with respect to Off-Highway Vehicle use, is the most balanced, will benefit fisheries and aquatic resources, reduce non-native invasive species, and enhance and maintain riparian zones.

Response: The Final Environmental Impact Statement analyzed three alternatives with different outcomes to address Plan Revision issues. Each alternative meets the intent of relevant laws, including the Multiple-Use Sustained-Yield Act of 1960, under which the National Forests are managed. The Regional Forester considered all of the alternatives and the Record of Decision describes his rational for the Selected Alternative. Forest managers believe the Selected Alternative represents the best balance in achieving sustainable ecosystems, meeting the intent of

relevant laws, and addresses the issues and concerns specific to the Huron-Manistee National Forests.

Aquatic Resource:

PC#: 12
Public Concern: The National Pollutant Discharge Elimination System generally requires permits obtained for activities that disturb an acre or more of land where some portion of the disturbed land discharges storm water to a lake, stream or wetland, or wetland contiguous to a lake or stream. It seems probable the Service would undertake such an activity. It is not clear how this will be addressed.

Response: The Huron-Manistee National Forests will comply with all applicable laws, regulations, and policies. The Forests will apply for and attain all National Pollutant Discharge Elimination Permits required by law to conduct its management activities.

PC#: 13
Public Concern: The Huron-Manistee National Forests should not make forest management decisions without thorough consideration of other activities in the watershed. The fragmented nature of the National Forest leads to unique complications. The Forest Plan revision is a framework from which holistic management can continue to develop.

Response: The Forests have attempted to incorporate Objectives, Standards, and Guidelines that guide sound forest management decisions at multiple scales. The Environmental Impact Statement discloses the anticipated direct, indirect, and cumulative effects of implementing this Plan. The Forests also recognize resource management complications that arise from its fragmented ownership, and attempt to consolidate lands where appropriate.

PC#: 14
Public Concern: Because so much of the land surrounding rivers are in the care of National Forest System Lands, the Huron-Manistee National Forests should develop a management plan that controls the impact this land has on river ecosystems.

Response: The revised Forest Plan contains many goals, objectives, standards, and guidelines aimed at protecting riparian habitats – "land surrounding rivers," and adjacent water bodies. For example, Chapter II of the revised Forest Plan: Goals, Objectives, and Desired Future Condition – Natural Resources; Chapter II of the Forest Plan: Standards and Guidelines- 2500 Watershed Management and 2600 Wildlife, Fish, and Sensitive Plant Habitat Management. The Final Environmental Impact Statement discloses the anticipated effects that implementation of the revised Forest Plan will have on riparian areas, water quality, and species that utilize these habitats. See Chapter III of the Final Environmental Impact Statement: Effects on Water Resources, Effects on Riparian and Wetlands, and Effects on Species of Concern; specifically Aquatic Habitats and Species of Concern and Terrestrial Habitats and Species of Concern: Rivers and Streams, Large pond and Lakes, Small Ponds and Lakes, Marsh, Bogs and Fens, Shrub/Scrub, and Riparian/Lowland Hardwood habitat groups for examples.

PC#: 15
Public Concern: The Final Environmental Impact Statement should identify impaired waters or proposed total maximum daily load allocations for waters within the proclamation boundary. The Final Environmental Impact Statement should note that there are no listed impaired waters or total maximum daily load allocations. In addition, Final Environmental Impact Statement should include a discussion of how the Forest Plan will affect or avoid affecting water bodies that have these concerns.

Response: There are listed impaired, non-attainment, waters within the proclaimed boundaries of the Huron-Manistee National Forests and these are displayed in Table III-1, Chapter III of the Final Environmental Impact Statement. Identification of impaired waters and total maximum daily load allocations are the responsibility of the Environmental Protection Agency and the Michigan Department of Environmental Quality. At the time of this writing, no total maximum daily load allocations for these waters had been developed. The Huron-Manistee National Forests will remain in compliance with any determinations from the Environmental Protection Agency and the Michigan Department of Environmental Quality.

PC#: 16
Public Concern: The Forest Plan Standards and Guidelines should elaborate on the methods employed for the protection of streams.

Response: The National Forest Management Act requires the Forest Service to monitor project activities to ensure that they comply with the revised Forest Plan objectives and Standards and Guidelines. Monitoring is outlined in Chapter IV of the revised Forest Plan. The monitoring matrix described requires that the Forests monitor: 1) population trends of Management Indicator Species and the relationships of population trends to habitat changes; 2) the number of acres and the percent of the Streamside Management Zone that is being actively managed for early successional stages; and 3) the amounts, distribution and types of available habitats to provide for the sustainability of terrestrial and aquatic ecosystems. Responding to these monitoring requirements will ensure that trout streams are protected. The specifics of monitoring protocols will be developed in the Monitoring and Evaluation Implementation Guide.

PC#: 17
Public Concern: The Forest Plan should include an objective or at least address the fact that, with the complete removal of Stronach Dam in 2003, river restoration work can begin now in and along the Pine River. There are 2 to 4 years worth of work to be done on severely eroded sand banks sending tons of sand into the river.

Response: The revised Forest Plan is permissive with respect to river restoration activities. However, specific activities, such as those that may be required along the Pine River because of the Stronach Dam removal, are implementation issues beyond the scope of Forest Plan revision. Implementation is addressed at the site-specific level under separate environmental analysis, documentation, and with public involvement. Implementation will also comply with the Pine River Management Plan.

PC#: 18
Public Concern: The Huron-Manistee National Forests should have a specific guideline added in the Riparian Management section that states that the 6th level watershed will be the analysis unit used to determine early-successional habitat needs within riparian corridors and that all lands, not just National Forest System lands, will be used in cumulative effects analyses. This guideline should mirror statements in the Final Environmental Impact Statement that state the 6th level watershed will be used as the analysis unit when determining early-successional habitat needs within riparian corridors. The determinations made for aquatic species of concern (page III-76), and the conclusion that there will be no adverse affect on aquatic Management Indicator Species (III-188) and riparian habitat and wetlands (page III-199) can not be made without such a guideline.

Response: The direction in the Final Environmental Impact Statement regarding sixth level watershed as the analysis unit for determining early successional habitat needs within riparian corridors is intended as guidance rather than a definitive standard. The revised Forest Plan is implemented at the project level under site-specific environmental documentation with public involvement. While the sixth level watershed will generally be used, the revised Forest Plan must allow sufficient flexibility, where Line Officers can use appropriate evaluation methods based on specific circumstances encountered on a case-by-case basis. The Huron-Manistee National Forests believe that a guideline specifying that sixth level watersheds be used would take away this important flexibility.

Cumulative effects analyses for project implementation always include all lands within the planning area so there is no need to restate that in a guideline for determining early-successional habitat needs.

The Huron-Manistee National Forests are confident that its determinations made for aquatic species of concern (page III-76, Final Environmental Impact Statement), and the conclusion that there will be no adverse effect on aquatic Management Indicator Species (III-188, Final Environmental Impact Statement) and riparian habitat and wetlands (page III-199, Final Environmental Impact Statement) is not tied to use of the 6th level watershed as an analysis unit.

PC#: 19
Public Concern: The Forest Plan should be more aggressive in placing large woody debris in rivers and streams.

Response: The Final Environmental Impact Statement, pages III-192 through 198, portrays beneficial effects for both aquatic Management Indicator Species and aquatic sensitive species from riparian vegetation management and desired future conditions for large woody debris (revised Forest Plan Table II-2). Chapter IV identifies the monitoring and evaluation strategy and provides a mechanism for evaluating and adjusting the revised Forest Plan as deemed necessary. Thus, if the stated goals for large woody debris are found to be inadequate based on monitoring, the numbers could be adjusted.

PC#: 20
Public Concern: The Huron-Manistee National Forests should not emphasize mitigation measures in watershed management because many of these procedures have little proven success. For example, best management practices, as practiced on the ground, rely on 50 or 100-foot buffers, and often ignore factors that contribute sediment just beyond the buffer. Sediment entering streams from timber-cutting, road-building, and other ground disturbing activity is often "mitigated" by sediment basins. These measures are questionable in value and do little to correct the action that got the sediment in the stream in the first place. With this type of activity brings its own set of problems, including the need for roads and landings for access, compromising wetland muck soils in the riparian zone from spoils dumping, introducing invasive plant species to an area, and perpetuating these species from the frequent maintenance required.

Response: Best Management Practices (BMPs), described in the revised Forest Plan under Watershed 2500 II-18, are proactive management guidelines aimed at preventing adverse impacts to water bodies before they occur. Utilization of BMPs is widely accepted by nearly all private and public land management agencies, including the Michigan Department of Environmental Quality, as the most effective means to minimize or prevent adverse impacts on riparian and aquatic ecosystems. The system of BMPs used in the revised Forest Plan includes considerations for slope, soil types, and impacts of large equipment.

Sediment in streams running through the Huron-Manistee National Forests comes from many diffuse sources throughout the watersheds; non-point source pollution. Much of it is believed to have come from historic land use practices such as excessive logging, poor farming practices and log drives during the late 1800s and early 1900s. Sediment also comes from stream crossings, road construction, and maintenance – federal, state, county, local, municipal construction activities, and land management practices such as timber harvest, wildlife management, and farming. Thus, the Forests' in-stream mitigation activities are aimed at correcting problems with streams that have resulted from a tremendous variety of sources. The revised Forest Plan includes Standards and Guidelines designed to prevent adverse impacts from in-stream mitigation practices such as stream bank stabilization and sediment basin construction and maintenance, for example, guidelines for disposal of spoils.

The revised Forest Plan also contains Standards and Guidelines aimed directly at protecting water quality, and contains an aggressive non-native invasive species management program, and allows for the Forests to actively partner with watershed councils and other organizations to proactively address water quality issues at the scale of the watershed.

PC#: 21
Public Concern: The Forest Plan should contain comprehensive guidelines and monitoring procedures for clearing of navigational hazards.

PC#: 22
Public Concern: The Forest Plan Guideline 3b at page II-20 for cutting in-stream woody debris should include an 8-foot maximum cleared width to prevent excessive removal of large woody debris for navigation purposes and set a clear, unambiguous standard.

PC#:23
Public Concern: The wording of Guideline 3b at page II-20 for cutting in-stream woody debris should be changed to promote safety. Currently, the wording is," If watercraft cannot go over, under or around woody debris, it constitutes a navigational hazard and may be cut only to the extent necessary for navigation." Experts can navigate a technical, albeit "navigable" constriction that to a less experienced paddler would present an imminent threat of capsize, pinning, and drowning. The recreating public would be much better served if the guideline was changed to emphasize safety.

Response: Specific procedures and guidelines for monitoring are not Forest Plan decisions (National Forest Management Act of 1976). However, the monitoring framework, provided in Chapter IV of the revised Forest Plan, establishes the basis for Forests to effectively monitor the revised Forest Plan. The potential for monitoring changes in aquatic habitats due to clearing exists and would fit within the framework if the Forests and their partners determine later that this activity is necessary.

Development of comprehensive guidelines for the clearing of navigation hazards was not identified as a Forest Plan revision issue and was not evaluated during the revision process. The Huron-Manistee National Forests could participate, along with other partners and stakeholders, in the development of such guidelines in individual river plans in the future, if the activity is determined to be necessary.

The Forests have changed Guideline 3b, Aquatic Restoration in Chapter II on page 19 to read as follows, "Natural, in-stream, or added large wood shall be left undisturbed unless it constitutes a navigational hazard. If woody debris presents an obvious and dangerous hazard, prudent moving of the wood should be undertaken to provide reasonably safe passage. The recommended clearing guideline is an eight-foot limit."

PC#: 24
Public Concern: The Huron-Manistee National Forests should conduct a forest-wide inventory of stream crossings. While it is recognized that some roads are necessary for users to gain entry into the National Forests, the direct and indirect impacts of any new road construction on aquatic resources should be thoroughly evaluated before any new road construction proceeds. If existing roads are adversely affecting aquatic resources, appropriate corrective actions should be taken immediately.

PC#: 25
Public Concern: The Huron-Manistee National Forests should rewrite Section 7700 under Transportation System, Guideline A3e at page II-41 to state that all water crossings should be designed to minimize stream sedimentation.

Response: The Forest Service is required to do a roads assessment plan for any changes in the National Forest road system (creation, elimination, or re-location of roads). This public process requires coordination with other agencies and interested publics.

Comprehensive inventories of all road-stream crossings have been done for the following major watersheds on the National Forests: Au Sable, Manistee (including the Pine River watershed), Little Manistee, Pere Marquette, Pine (Au Sable – Lake Huron), and White River watersheds. There are more than 1,500 cataloged road-stream crossings within these watersheds. Structures consist of culverts and bridges. We recognize the need for a geographic information system for these completed inventories. To date, the Little Manistee, White, and Pine River (Lake Huron) watershed inventories have been entered into a Geographic Information System database.

During the last decade, the Forest Service has placed an emphasis on upgrading road-stream crossings to reduce sediment delivery to adjacent aquatic and riparian habitat as part of overall watershed restoration partnerships. This has been accomplished primarily with the County Road Commissions.

Section 7700, Transportation System Guideline A3e, on page II-40 has been changed to state that all water crossings will be designed to minimize stream sedimentation.

PC#: 26
Public Concern: There are no explicit details about how aquatic monitoring will be accomplished. Chapter IV describes species monitoring and the frequency of monitoring. However, there is no information on how this will be achieved. There is no mention of sensitive species being monitored.

Response: Chapter IV, Monitoring and Evaluation provides the monitoring framework for the revised Forest Plan. This is meant to be a plan and is designed pursuant to National Forest Management Act regulations. It is specifically designed to provide the Forests flexibility adapting to changes, such as new scientific information or emerging issues. There are monitoring considerations within Chapter IV that pertain directly to sensitive species and it is designed to help determine if viable populations of appropriate native and desirable non-native species are being maintained within the planning area. Specific information regarding the “what” and “how” of monitoring is not a Forest Plan revision decision (National Forest Management Act of 1976).

PC#: 27
Public Concern: The Forest Plan should emphasize the importance of evaluating and monitoring of the riparian corridors. Streambank stabilization work is important, but much of the stream stabilization and habitat improvement work on the Forest has not been evaluated effectively.

Response: The Huron-Manistee National Forests recognize the social, economic, and ecological importance of riparian corridors and have developed numerous goals, objectives, standards, and guidelines to ensure the proper management of these systems. With respect to monitoring within riparian corridors, specific information on the “what” and “how” is not a Forest Plan revision decision (National Forest Management Act of 1976). However, the monitoring framework, provided in Chapter IV of the revised Forest Plan, establishes the basis for the Forests to monitor riparian corridors and the success or failure of such management activities as streambank stabilization projects. For example, as is shown in the monitoring matrix in Chapter IV, the

amount, distribution, types of available habitats, species viability, successional status, and acres of Streamside Management Zone vegetation will be monitored.

PC#: 28
Public Concern: The Huron-Manistee National Forests should establish an objective to monitor and study upstream thermal migration of warmer temperatures, which is a problem nationwide due to past logging, mining, agricultural and other practices within riparian zones. This effort would assist with reclaiming and stabilizing cold-water streams and habitats.

Response: The revised Forest Plan, Chapter IV: Monitoring and Evaluation provides the monitoring framework. This framework is intentionally general with respect to specific species, environmental parameters, and methods. This provides the Forests flexibility in adapting to changes, such as new scientific information or emerging issues. Monitoring considerations within Chapter IV that pertain directly to the above issue of concern are: 1) the Forest's will monitor the amounts, distribution, and types of available habitats, including water temperature, to ensure the sustainability of terrestrial and aquatic ecosystem at multiple scales; 2) the Forest's will monitor to ensure that the minimum viable populations of appropriate native and desirable non-native species will be maintained within the planning area; 3) monitor the acres and percent of the Streamside Management Zone that is late successional vegetation to ensure protection of water quality and provide a source of large woody debris; and 4) the acreage and percentage of the Streamside Management Zone that is being managed for early successional vegetation will also be monitored. Specific information concerning the "what" and "how" of monitoring will be included in the "Monitoring and Evaluation Implementation Guide."

PC#: 29
Public Concern: The Huron-Manistee National Forests should include examples or provide a more complete definition of the term "disturbance" as it is used in the revised Forest Plan, 2500, 1-Water, Section A, item 3.

Response: The term, "disturbance", as used in ecology and resource management, describes, "any relatively discrete event in time that disrupts ecosystem, natural community, or population structure and changes resources, substrate availability, or the physical environment" (Helms 1998). While the entire definition applies in this context, the focus is on disruption of substrate availability. Most frequently, the concern is the compaction or exposure of mineral soils within the Streamside Management Zone, which increases the chance for overland flow and/or eroded soils to enter the water body.

PC#: 30
Public Concern: A number of trout streams are shaded by mature, full canopy trees that let little if any sunlight reach the banks, which are bare ground. After a major rainfall and spring runoff the erosion of the banks continues, and will do so until the mature trees are harvested and sunlight reaches the banks allowing grassy vegetation and shrubs to grow which decreases erosion significantly.

PC#: 31
Public Concern: It has been noted by fisheries experts that old growth has a negative effect on both the rivers and the fishery.

PC#: 32
Public Concern: Old growth promotes increased sedimentation into the river.

PC#: 33
Public Concern: The brook trout is an important inhabitant of streams. The assumption of the need for 40 percent forested state, sediment removal, gravel placement and especially "large wood for structural complexity" does not figure. They are a pioneer species that likes spring water. If that spring water flows through a rich meadow with under cut banks, all the better. In addition, the turf will filter runoff and recharge groundwater so you will not have to remove sediment or add gravel.

Response: The Final Environmental Impact Statement portrays effects of Forest Plan implementation on aquatic resources and associated streamside vegetation. The environmental assessment that accompanied the Forest Plan Amendment #24 for the designation of old growth portrayed positive effects for the aquatic and riparian ecosystems. Old-growth management will not result in increased sedimentation. This conclusion is based on current science from the Michigan Department of Natural Resources (Tonello, M., C. Freiburger, A. Nuhfer, and S. Sutton. 2004). Riparian and streamside management guidelines will have a positive effect on water quality and the stream fishes of the Huron-Manistee National Forests. (Final Environmental Impact Statement, pages III-22, III-33-36, III-192-198).

Research from the North Central Research Station has shown that when more than 60 percent of a watershed is in an open-land, including forests greater than 15 years of age, overland run-off increases (Verry, E.S. 2000). This change increases instream erosion, which is presumed to affect brook trout habitat adversely through flow scouring and subsequent sedimentation.

PC#: 34
Public Concern: The Forest Plan should contain an additional guideline on page II-20, at 3a, which affords special consideration to the needs of other riparian species.

Response: The revised Forest Plan, Chapter II-6 identifies a desired future condition that provides habitat needs of riparian dependent species. Modification was made to the guideline found on page II-20, number 2500, I.A.4.a, to state: "Aquatic habitat restoration will consider the needs of all riparian dependent species."

PC#: 35
Public Concern: The Huron-Manistee National Forests should consider proximity to water bodies when selecting locations for specific projects because mining activities and clearing activities have the potential to affect water quality and flow. In addition, we note that the project-specific environmental impact documents for these activities will need to address impacts to water.

Response: The Forest Service is required to comply with the National Environmental Policy Act. The revised Forest Plan Standards and Guidelines do take into consideration proximity of water bodies when implementing management activities.

Project specific impacts to water quality will be addressed in accordance with the National Environmental Policy Act at the site-specific level, which includes environmental documentation and public involvement.

PC#: 36
Public Concern: The revised Forest Plan should be corrected, as there is a conflict between Standards and Guidelines, 2600 VI Wetlands, Section D, Page II-34 and 2600 VIII Fish, Section C-1. Specifically, the guidelines listed in 2600 VI Wetlands, Section D, Page II-34 states that early-successional shrub/scrub habitats in patches 25 acres or larger within wetland/riparian areas will be managed on each forest, and that areas to be managed for early-successional habitat would be within areas where these vegetation types exist. This is in direct conflict with 2600 VIII Fish, Section C-1 if the shrub/scrub habitat already exists due to natural disturbance processes (even within 200 feet of designated trout streams).

PC#: 37
Public Concern: The revised Forest Plan should be corrected as there is a conflict with Riparian Management Standards and Guidelines, section 2500, which are inconsistent with the Standards and Guidelines listed under section 2600 Wildlife, fish, and Sensitive Plant Habitat Management.

PC#: 38
Public Concern: The revised Forest Plan should discourage vegetation activities, which encourage beaver along trout streams. For example, VIII Fish, Guideline C-1, page II-35: "Protect state-classified trout streams. Vegetation attractive to beaver should be discouraged within 200 feet of streams." The vast majority of streams on the Huron-Manistee National Forests are classified by the Michigan Department of Natural Resources as trout streams. Given that the Streamside Management Zone extends at least 100 feet from the streams edge, active management for early-successional habitat within this Streamside Management Zone will not discourage vegetation attractive to beaver.

PC#: 39
Public Concern: There appears to be an inconsistency between guidelines for Streamside Management Zone early-successional habitat enhancement, and discouraging beavers along trout streams.

Response: The revised Forest Plan allows for multiple objectives in riparian corridors. In general, riparian vegetation will be managed for late seral stages. However, early successional habitat management to meet viability requirements of endangered, threatened, or sensitive species may be undertaken if natural disturbance processes are not meeting these requirements.

The inconsistency between the guidelines in Section 2500, I-Water, 1-Riparian Vegetation Management, a & b, page II-17; and Section 2600, VI-Wetlands, D, page II-34; and VIII-Fish, C1, page II-35, has been clarified in the revised Forest Plan.

The guideline listed in Section 2600, VI-Wetlands, D, page II-34: "Manage early-successional shrub/scrub habitats in patches 25 acres or larger within wetland/riparian areas on each Forest. Areas to be managed for early successional scrub/shrub habitat would be within areas where these vegetation types exist" will be changed to "Manage early successional shrub/scrub habitats in patches 25 acres or larger within wetland/riparian areas on each Forest where the need to meet species viability has been determined on a case-by-case basis. Areas to be managed for early successional shrub/scrub habitat would be within areas where these vegetation types exist or existed but are succeeding to later seral stages and the need for meeting species viability is identified and analyzed. This guideline does not apply in management areas 5.1, 7.1, 8.2 and 9.1," to clarify the intent of the guideline.

PC#: 40
Public Concern: Placement of large woody debris in the Au Sable River has ruined the scenic quality of the area. Some of us have snorkeled the Au Sable where you have placed dead trees in the past and have not seen one fish.

Response: The Forest Plan identifies large wood as an objective to aquatic habitat restoration. Therefore, placement of large wood in rivers, such as the Au Sable and Manistee Rivers, is an ongoing practice. Hicks et al. 1991, Bisson et al. 1987, Verry 1992, Verry and Dolloff 2001, and Hilderbrand et al. 1997 all provide excellent synopses of the various functions that large woody debris plays in stream systems. While initial visual impacts may occur, monitoring results indicate that the placed wood blend in with the natural environment within a short period, generally two to three years. Species of tree used may also affect short-term visual quality.

Huron-Pines Resource Conservation and Development Council did underwater photography of the trees placed below Alcona Dam on the Au Sable River. The photography showed that fish were using the trees as structure. In addition, Forest Service observations have shown a variety of other riparian species using these trees, such as mink, wood turtle, and great blue herons.

PC#: 41
Public Concern: The Huron-Manistee National Forests should explain how specific numbers of large woody debris structures per 300 feet of stream were attained.

Response: Numbers were derived from our best professional judgment and observations of natural disturbances in streams with occurrences of large wood in northern Michigan. These guidelines are continually being refined because of our monitoring both of placed wood and from natural levels in streams on the Huron-Manistee National Forests. If long-term monitoring indicates that these guidelines for large wood need to be adjusted, then the Forest Plan will be amended.

Aspen:

PC#: 42
Public Concern: The revised Forest Plan should plan for 1,500 acres of annual aspen harvest outside of Grouse Emphasis Areas rather than 2,410 acres as projected in the Selected Alternative.

PC#: 43
Public Concern: The Huron-Manistee National Forests should manage aspen, birch, and oak more intensively for grouse, woodcock, deer, and other bird species that are dependent upon aspen. Clearcutting should be allowed to provide for game bird habitat.

PC#: 44
Public Concern: The Huron-Manistee National Forests should reduce the overabundance of aspen and birch forest and achieve a more sensible balance of forest types.

PC#: 45
Public Concern: The Huron-Manistee National Forests should not reduce the aspen forest type because it will have a negative impact on early successional depend wildlife species, hunting recreation, and result in increased pressure for these resources on state-owned land.

PC#: 46
Public Concern: The Final Environmental Impact Statement should recognize that aspen is far more significant for today's society than it was in the pre-settlement forest and that aspen should not be allowed to convert to other forest types.

PC#: 47
Public Concern: The revised Forest Plan should allocate fewer acres to aspen and birch management because the forest type only occurred marginally in pre-settlement forests.

PC#: 48
Public Concern: The Final Environmental Impact Statement places too much emphasis on aspen and birch and fails to account for the forest type on State and private lands.

Response: The Forests conducted an Analysis of the Current Management Situation, September 18, 2003. The Analysis of the Current Management Situation evaluation identified that there were no critical or compelling reasons to change the direction or strategy in the Forest Plan for several issues. Aspen was one of the issues that did not require a change in direction.

It is recognized that aspen is important to many game and nongame species as well as to local economies partly dependent upon the forest products industry. As such, it is one of several habitat types analyzed in the revised Forest Plan and Final Environmental Impact Statement. The Selected Alternative provides for a mix of forest types and age classes within a variety of habitat types, including aspen, while maintaining species viability. The Selected Alternative strives toward a balance between ecological, economic, and social considerations. As disclosed in the Final Environmental Impact Statement, implementation of the Selected Alternative projects 149,909 acres of aspen on the Forests within the first decade. This is a reduction of 11,504 acres of aspen from the current 161,413 acres available. This decrease in aspen acreage is expected to have a small impact on the population of deer and grouse; however, species viability for both deer and grouse is not expected to be adversely impacted (Chapter III, page III-178 – III-192, Final Environmental Impact Statement).

Clearcutting is one tool available to improve grouse and deer habitat, and is expected to continue to be used where appropriate on the Huron-Manistee National Forests. However, when and where this tool will be utilized, however, is evaluated on a site-specific basis and, therefore, is outside the scope for Forest Plan revision.

Page III-233 of the Final Environmental Impact Statement discloses the amount of aspen managed on a statewide basis for all ownerships. Taking into consideration the amount of aspen managed on State and private lands. Additionally, the aspen resource is analyzed from a statewide perspective in the cumulative effects section for Management Indicator Species (Chapter III, page III-192, Final Environmental Impact Statement). Also disclosed is the percentage the Huron-Manistee National Forests contributes to statewide aspen management. Other alternatives evaluating different levels of aspen management were considered, but because they did not respond to the Forest Plan revision issues or maintain species viability, they were eliminated from further consideration (Chapter II, page II-3, Final Environmental Impact Statement). The alternatives pertinent to aspen included minimum, passive, maximum and maximum multiple use management.

Forest succession is a natural process that requires time, measured in decades or centuries. Most of the decline in the aspen vegetative class for all alternatives is due to succession. Based on the current age distribution of aspen, declines in the aspen vegetative class would not be expected by Decade 3. However, by Decade 10 a significant difference in the amounts of aspen is reflected in the three alternatives. By Decade 2 in the Selected Alternative, the Forests expect to lose approximately 12,000 acres of aspen. By Decade 10, approximately 49,400 acres of aspen is lost (Final Environmental Impact Statement, Table III-24, page III-227).

When determining the most appropriate mix of species composition to meet the different management objectives of the alternatives the Forests considered current species types, age class distribution, soil types, landscape patterns, needs of species of viability concern, and recreational opportunities. Early successional forests make important contributions to biodiversity at the landscape scale; thus, early successional forest continues to be a strong emphasis in the revised Forest Plan, providing a balance between competing demands for use of the Forests' resources. Aspen is valuable habitat for ruffed grouse, woodcock, and other early successional wildlife species and some manufacturers depend on aspen for their products. Young aspen stands, less than 10 years old, and other shrub-dominated areas are important to a number of neotropical migrant bird species such as the golden-winged warbler. Projections for the Selected Alternative show that aspen in this young age class, less than 10 years old, will increase over the next two decades while, as a whole total aspen acres actually decrease as part of ecological restoration to promote species viability and to enhance ecosystem function.

All alternatives analyzed create a balance of habitats, from young to mature forests, perpetuating habitats for both game and nongame species.

Barrens – Savannahs – Openings:

PC#: 49
Public Concern: The Final Environmental Impact Statement should be corrected as it states on pages ES-17 and III-166 that 68,000 acres of barrens and prairies will be created under Alternatives B and C, while on page III-340 it states that 73,650 acres will be created.

Response: The statement on page III-357 of the Final Environmental Impact Statement has been changed to show that the acreage of proposed conversion includes acres converted from early-successional habitat to later-successional habitat, in addition to those acres converted from forested conditions to barrens and prairies. The figure of 73,650 acres is correct. The number of barrens and prairie acres that are projected for establishment in the Selected Alternative, as well as Alternative C, are 68,000 acres.

PC#: 50
Public Concern: The Final Environmental Impact Statement should disclose which endangered, threatened, and sensitive species require early successional habitat. The Final Environmental Impact Statement Glossary should define mesic and dry grasslands; it is not clear which species will benefit from large openings.

Response: The endangered, threatened, Regional Forester's Sensitive Species, and species with viability concerns that need early-successional habitats and benefit from large openings can be found in the Final Environmental Impact Statement, beginning on page III-81, and locating the appropriate habitat communities of interest, and in Appendix B, Species Viability Evaluation.

The actual size of a barren or savannah is characterized in the revised Forest Plan for many of the Management Areas. For example, Management Area 2.1, page III-2.1-6, section 2600, I, General Management, states:

I General Management
- A Mesic Grasslands
  - 1 Manage mesic grassland habitats as areas 250 acres or larger.
  - 2 If 250-acre areas are not attainable, provide multiple areas 75 acres or larger, which total at least 250 acres within a 640-acre area.
  - 3 Manage multiple habitat areas within one mile of each other to increase suitability if possible.
- B Dry Grasslands
  - 1 Manage dry grassland habitat, 250 acres or larger in Landtype Associations 1 and 2.
  - 2 Manage multiple habitats as blocks when they are within one mile of each other to increase suitability.

Definitions of mesic and dry grasslands are in the glossary. Table II-3, vegetation composition objectives, page II-7, has been modified to display vegetative composition objectives of barrens and openings.

PC#: 51
Public Concern: The Final Environmental Impact Statement should disclose evidence that barrens actually have an objective reality in the specified areas proposed for treatment. Otherwise, it is misleading to continually reference "restore or restoration" of barrens areas unless the evidence exists.

Response: Species Viability Evaluations completed for Forest Plan revision indicate that current oak, oak-pine and pine barrens ecosystems are found in very small portions of their original range across the forests (see Analysis of the Current Management Situation 9/18/2003, Appendix C, Species Viability Evaluations). It is not surprising, therefore, that the Forests have over 20 at-risk plant and animal species associated with these habitats, including two federally listed species (see Final Environmental Impact Statement, Appendix B, Species Viability Evaluation). Using current information on barrens species ranges and habitat needs, data on historic barrens locations, and amounts and frequency of fire events that likely created barrens habitat, the Forests developed conservation measures for maintaining enough barrens habitat for associated species-at-risk. Conservation measures include creation and maintenance of barrens habitats in ecosystems that, historically, were likely to support these habitats. The Forest Plan does not specifically locate barrens restoration sites, as these will be determined at the site-specific level.

Barrens and savannahs will be either created or restored depending on the current condition of the site proposed for management as determined at the time of the site-specific analysis. A large amount of the barrens and savannahs are required because of the Forest's Species Viability Evaluation process that calls for converting forested stands to barrens or savannahs, Table III-20 to Table III-23, beginning on page III-221, in the Final Environmental Impact Statement.

PC#: 52
Public Concern: The Final Environmental Impact Statement should disclose where openings might be created, cumulative effects of openings and impacts on water quality and soil disturbance from opening creation and maintenance. All of this information and effects should be consolidated in a separate section of the Final Environmental Impact Statement.

Response: The Final Environmental Impact Statement discusses the cumulative impacts of barrens creation at the Forest Planning level, which is broad and strategic. Species Viability Evaluations completed for Forest Plan revision indicate that current oak, oak-pine and pine barrens ecosystems are found in very small portions of their original range across the forests (see Analysis of the Current Management Situation, Appendix C, Species Viability Evaluations). It is not surprising, therefore, that the Forests have over 20 at-risk plant and animal species associated with these habitats, including two federally listed species (see Final Environmental Impact Statement, Appendix B, Species Viability Evaluation). Using current information on barrens species ranges and habitat needs, data on historic barrens locations and amounts and frequency of fire events that likely created barrens habitat, the Forests developed conservation measures for maintaining enough barrens habitat for associated species-at-risk. Conservation measures include

creation and maintenance of barrens habitats in ecosystems that historically were likely to support these habitats. The revised Forest Plan does not specifically locate barrens restoration sites, as these will be determined at the site-specific level. Selection of areas for barrens restoration will be based on species needs. More site-specific cumulative effects analyses will occur as barrens restoration locations are selected and analyzed. There will be an effort, where possible, to coordinate fuelbreak creation and barrens restoration.

Site-specific analysis, including cumulative effects on water quality, will be conducted and management prescriptions will be adjusted accordingly. Any land management activity will utilize State of Michigan Best Management Practices to mitigate negative effects to water quality.

Increased invasive plant infestations will be problematic in barrens restoration projects. The revised Forest Plan includes Standards and Guidelines to prevent the spread and control of non-native invasive species. Treatments, such as implementing non-native invasive plant control measures or seeding with native plants, will be developed at the site-specific level. The Forests' monitoring plan will have protocols designed to measure the effectiveness of management practices on controlling the establishment and spread of non-native invasive species.

Barrens restoration activities, as with other Forest management activities, are required to maintain long-term soil productivity. The potential for soil compaction and or loss beyond allowable quantities will be addressed through site-specific analyses; cumulative effects are described in the Effects on Soils section of the Final Environmental Impact Statement, page III-14 to III-17.

The timing of implementation and methods to be used in barrens restoration will be addressed through site-specific National Environmental Policy Act analysis, including cumulative effects.

Alternate formats could have been used for Chapter III of the Final Environmental Impact Statement, such as emphasizing opening management. However, we chose to use the current format to better organize and clearly identify management for endangered, threatened, and sensitive species and communities on the Forests, which was a major factor in the revision process.

PC#: 53
Public Concern: The revised Forest Plan should maintain and implement the current 1986 Forest Plan in regards to openings. The aggressive interest in massive opening creation before the public has had an adequate opportunity to express their view is misplaced.

Response: The Forests believe that interested publics have had adequate opportunity to express their concerns and views on the Forest Plan revision. During the initial phases of Forest Plan revision, the Forests conducted an Analysis of the Current Management Situation and several public involvement sessions to obtain Need for Change topics. These topics were published in the Notice of Intent document on September 18, 2003. The Huron-Manistee National Forests received many comments from groups, government agencies, tribes, and individuals, as well as employees on the Notice of Intent. All comments, concerns, and questions received were

reviewed and categorized. Based on this review and categorization, "issues" regarding the proposed management activities in the Notice of Intent were developed. An issue is defined as a point of uncertainty or debate about the social, ecological, or economic effects of the management activities being proposed.

The need for an increase for openings was established as part of the Forest Plan revision Need for Change process and Analysis of the Current Management Situation, as disclosed in that documentation (planning record on file in the Supervisor's Office) and in the Purpose and Need for Action, Final Environmental Impact Statement, pages I-1 through I-3. The increase in openings is to meet species viability needs and recovery of threatened and endangered species such as the Karner blue butterfly. Monitoring of the implementation of this program and progress in meeting objectives is included in the revised Forest Plan, Monitoring and Evaluation, Chapter IV.

PC#: 54
Public Concern: The Final Environmental Impact Statement should disclose the justification for converting large acreages into barrens and savannahs. The Final Environmental Impact Statement already recognizes the increasing trend toward urbanization of the private lands in and around the Huron-Manistee National Forests. That trend will result in a substantial amount of barrens, savannahs, and openings with no need for further restoration activities.

Response: The creation and management of barrens, savannahs, prairies and smaller openings, less than 10-acres, on the Forests are not equal to the open areas created by urbanization of private lands. Barrens, savannahs, prairies, and small openings in the Forest are located and designed to promote habitat that will be used by specific endangered, threatened, sensitive, and other desirable native species. While some portion of urbanized private lands within the Forests' proclamation boundary may create habitat suitable for use by endangered, threatened, sensitive and other desirable plant and animal species, there is no way of guaranteeing or predicting what those acres might be or how they may be managed now or in the future.

Species Viability Evaluations completed for Forest Plan revision indicate that current oak, oak-pine and pine barrens ecosystems are found in very small portions of their original range across the forests (see Analysis of the Current Management Situation, Appendix C, Species Viability Evaluations). It is not surprising, therefore, that the Forests have over 20 at-risk plant and animal species associated with these habitats, including two federally listed species (see Final Environmental Impact Statement, Appendix B, Species Viability Evaluation). Using current information on barrens species ranges and habitat needs, data on historic barrens locations, and amounts and frequency of fire events that likely created barrens habitat, the Forests developed conservation measures for maintaining enough barrens habitat for associated species-at-risk. Conservation measures include creation and maintenance of barrens habitats in ecosystems that historically were likely to support these habitats. The Forest Plan does not specifically locate barrens restoration sites, as these will be determined at the site-specific level.

Table II-3 was changed in the Forest Plan to "Openings." Previously, it was, "Managed Openings (less than 10 acres)". Table III-24 in the Final Environmental Impact Statement on

page III-234 displays the amount of openings to be managed by decade. This refers to all openings.

PC#: 55
Public Concern: The Final Environmental Impact Statement should include a specific discussion of prevention measures the Huron-Manistee National Forests will use to address potential invasive spread in the clearing and restored barrens areas, since these acres would be especially prone to invasive encroachment. If the mitigation does not apply in these areas, it is strongly recommended that they be designated as special emphasis areas for invasive species control.

Response: The Forest Plan provides Forest-wide Standards and Guidelines, which address prevention and control of non-native invasive species at the Management Area level. Site-specific analysis also addresses non-native invasive species at the barrens restoration, or project level, and, if needed, may include mitigation measures to help prevent spread. The Forests' monitoring plan will have protocols designed to measure the effectiveness of management practices on controlling the establishment and spread of non-native invasive species. Should monitoring indicate a need, the Forest Plan can be amended.

The Forest Service Manual and Handbooks also have specific direction for the management of non-native invasive species on National Forest System lands that have been incorporated into the planning documents by reference (revised Forest Plan, page I-6).

PC#: 56
Public Concern: The revised Forest Plan should discuss the desired amount of mesic grassland and the distribution across the Forests.

Response: The revised Forest Plan, Chapter II, provides forest-wide Management Area direction and objectives to provide "the amount and quality of habitat necessary to sustain minimum viable populations that represent existing native vertebrates throughout the Forests." The Species Viability Evaluation process, Appendix B, considered the mesic grassland habitat group and identified conservation measures for this group. Chapter III, Management Area Direction, Goals and Objectives, and the 2600 section discuss the Standards and Guidelines that provide habitat conditions that meet species needs. While the specific amount has not been identified in the Forest Plan Chapter II and III, it has been disclosed in the Final Environmental Impact Statement, Chapter III, Biological Resources, Large Open Grasslands Habitat Group. The direct and indirect effects for Alternatives B and C provide direction for the creation and maintenance of up to 2,500 acres of grassland habitat. The Species Viability Evaluation documentation for this large open grassland habitat group further clarifies the habitat amount and its distribution. It identifies five areas on each Forest where these habitats will be created or maintained to meet these species viability needs.

PC#: 57
Public Concern: Since barrens restoration areas may be attractive to recreational uses, the Final Environmental Impact Statement should evaluate potential impacts to barren restoration areas from motorized use.

Response: Broad level effects from recreational motorized use have been evaluated in the Final Environmental Impact Statement starting on page III-149. Motorized use on the Forests is restricted to roads and designated trails and areas (revised Forest Plan, Chapter II, page II-13). Site-specific analysis with public involvement will address needs for protection of created barrens.

PC#: 58
Public Concern: The Forest Plan should specify which prairie species will be used in barrens restoration work and indicate the seed source.

Response: The revised Forest Plan Standards and Guidelines call for the use of genetically appropriate local genotypes when they are available or non-persistent non-natives. What species will actually be planted will be determined during the site level project development, analysis, and project implementation.

PC#: 59
Public Concern: The Huron-Manistee National Forests should not destroy timber stands and convert them to barrens or for fuels management purposes. It is particularly objectionable to lose recent investments that have been made in red pine stands.

PC#: 60
Public Concern: We are concerned that removing 68,000 acres from forest production could have a negative long-term impact on timber outputs from the forests. Perhaps the acreage should be reduced.

Response: Species Viability Evaluations completed for Forest Plan revision indicate that current oak, oak-pine and pine barrens ecosystems are found in very small portions of their original range across the forests (see Analysis of the Current Management Situation, Appendix C, Species Viability Evaluations). Consequently, the Forests have over 20 at-risk plant and animal species associated with these habitats, including two federally listed species, which are the Karner blue butterfly and Kirtland's warbler (Final Environmental Impact Statement, Appendix B, Species Viability Evaluation). Using current information on barrens species ranges and habitat needs, data on historic barrens locations, and amounts and frequency of fire events that likely created barrens habitat, the Forests developed conservation measures for maintaining enough barrens habitat for associated species-at-risk. Conservation measures include creation and maintenance of barrens habitats in ecosystems that historically were likely to support these habitats. The Forest Plan does not specifically locate barrens restoration sites, as these will be determined at the site-specific level. Selection of areas for barrens restoration will be based on site-specific ability of the site to maintain and support a barrens ecosystem, as well as species needs, regardless of current Forest Type.

Because of mixed ownership patterns within the Forests' proclamation boundary, there is extensive wildland/urban interface. It is the Forests priority to protect private property and public safety through fuels management.

The Forests do not anticipate a reduction in the amount of timber outputs as measured by allowable sale quantity due to barrens, savannah, or prairie restoration activities (see Final Environmental Impact Statement, Appendix A. The projected fiber output from dedicated timber production lands is expected to increase under the chosen alternative, even with the proposed removals of timber production lands for creation and restoration of savannahs and prairies. The number of acres of barrens and savannah habitat desired on the Forests' was determined through the Species Viability Evaluation process using the best available information.

PC#: 61
Public Concern: It is well recognized that remnant prairies exist in small areas of the southern part of the Manistee National Forest (Sparta soils series sites) and are often forested with closely spaced rows of red and jack pine plantations. It appears the primary purpose of pine plantings was prevention of wind erosion (from review of Soil Survey of Newaygo County, Michigan. What does the Plan Revision mean by "Sparta soils should be managed as prairies?" Does the Plan revision propose to de-forest these Sparta soils? Removing tree cover from Sparta soils will again subject these soils to wind erosion and reverse past management practices designed and successfully implemented to stabilize these soils.

Response: The Forests plan to manage the Sparta sand soils, classified as not severely eroded, for prairies. As with other forest management activities, prairie restoration activities are required to maintain long-term soil productivity. The potential for wind erosion and soil loss beyond allowable quantities will be addressed through site-specific analyses and project-level implementation, which will include public involvement.

Conifer – Jack Pine:

PC#: 62
Public Concern: The Huron-Manistee National Forests should maintain jack pine on appropriate sites within the 4.2 Management Area.

Response: A description of Management Prescription Area 4.2 can be found in the revised Forest Plan (page II-1, III-4.2-1 to III-4.2-15). Stand specific prescriptions for reforestation, based on Ecological Land Type Phases, are considered site-specific, and are not determined at the forest plan level.

PC#: 63
Public Concern: The Huron-Manistee National Forests should manage jack pine using the uneven-aged silvicultural method because it produces healthier forests and benefits many nongame wildlife species.

Response: Jack pine is adapted to regeneration by stand replacing wildfire. Jack pine requires full sunlight to regenerate. Clearcutting, even-aged silvicultural system, mimics the regeneration effects of wildfire and is the optimal method for regenerating this forest type. Many non-game wildlife species utilize these clearcut areas at various stages of regeneration.

Conifer – Red Pine:

PC#: 64
Public Concern: The Forest Plan should create barrens, savannahs or prairies over the next 10 years because, planted with legumes, they will provide food and nesting habitat for many non-game birds, the endangered Karner blue Butterfly, plus food for ruffed grouse and turkeys. Extensive final harvest of red pine plantation would provide outstanding areas for grassy openings and barrens.

Response: The Forests agree, although it is unknown how much of barrens, savannahs, or prairies restoration will actually occur in red pine *plantations*. Projections indicate that approximately 34,000 acres of barrens, prairies, and openings will come from red pine stands.

PC#: 65
Public Concern: The Huron-Manistee National Forests should not create Kirtland's warbler and Karner blue butterfly habitat at the expense of red pine stands. Red pine acreage should be maintained by adopting a policy of no-net-loss of red pine stands.

Response: The revised Forest Plan is a broad, strategic document, and does not specify where management activities will occur. It is acknowledged that some conversion of red pine stands may occur for the perpetuation of the Kirtland's warbler. If so, site-specific analysis would include potential impacts to other resources.

In the first two decades of the Forest Plan, approximately 15,500 acres of red pine are projected to be converted from red pine stands to barrens, savannahs, and openlands (Final Environmental Impact Statement, Table III-24, page 234), which include restoration for Karner blue butterfly. In the same table, a comparison of the current number of red pine acres, 197,694 acres, and decade five, 163,309 acres, projects that approximately 34,400 acres of red pine would be converted to barrens, savannahs, and open lands. (see also Final Environmental Impact Statement, page III-230)

The Forests do not have plans to replace red pine plantation acreages that are converted to Kirtland's warbler habitat or barrens and savannahs. However, it is important to note that even with this projected reduction; red pine will still be a significant forest type across the landscape. Overall impacts of the projected reduction in red pine acres over the 50-year planning horizon were analyzed for each alternative and disclosed in the Final Environmental Impact Statement, Chapter III, pages III-231 to III-243.

The Selected Alternative strives to achieve a balance in the amount of timber scheduled for harvest, with consideration for other resources. The Forests also recognized the need for ecosystem restoration and landscape-level management of resources to promote species viability and to enhance ecosystem function.

PC#: 66
Public Concern: The Final Environmental Impact Statement should revisit forest management guidelines for red pine plantations and jack pine, oak, and aspen stands because overmaturity and mortality are occurring 20 – 50 years sooner than anticipated.

Response: The Forests are not experiencing significant mortality in the forest types mentioned in the comment, therefore, a need to re-examine red pine management guidelines has been determined to be unnecessary. Monitoring and Evaluation criteria have been established to re-assess forest health and, if new information becomes available, forest type management guidelines can be amended (revised Forest Plan, Chapter II, page II-7, and in many of the forest-wide Standards and Guidelines).

PC#: 67
Public Concern: The Huron-Manistee National Forests should use a species site suitability system (Kotar plant habitat typing) in determining sites suitable for conversion from red pine (27,000 acres) to jack pine in Kirtland's warbler habitat creation areas.

Response: The current system used to determine site suitability for jack pine is the Ecological Land Type Phase, see Field Guide for Ecological Classification and Inventory System of the Huron-Manistee National Forests). Ecological Land Type Phase maps exist for the entire Forests. The Huron-Manistee National Forests have successfully applied an ecological classification system for many years, especially in regards to jack pine and red pine sites. The Forests have invested significant resources in development and utilization of this system and have chosen to continue using it in landscape scale decision making during the forest planning revision process. We continue to review other classification systems for incorporation into or modification of our system.

The revised Forest Plan is a broad, strategic document and does not specify where management activities will occur. However, at the project implementation level, some red pine stands may be converted to jack pine for Kirtland’s warbler habitat. After five decades, approximately 34,400 acres of red pine would be converted to barrens, savannahs, and open lands (Final Environmental Impact Statement, Chapter III, page III-235).

PC#: 68
Public Concern: The revised Forest Plan should shorten the rotation age for red pine (currently 100 years) producing a sawlog product more desired by forest industry.

Response: The revised Forest Plan allows rotation ages of 70 to 120 years in red and white pine (Table II-10, page II-17). Market and economic resources are considered as part of the Forest Plan revision process (The Social and Economic Assessment for the Michigan National Forests, Leefers et al. 2003). This includes forest industry capabilities; however, these capabilities are dynamic and are expected to adapt as technologies and other needs necessitate. There are always possibilities of substitution of raw materials from other sources, changes in production efficiency due to modernization, and a myriad of other possible changes, which affect industry requirements. As such, although considered, product requirements are not a driving force in land management planning. The species/product mix produced by the Selected Alternative results

from harvesting activities to meet other resource goals, such as habitat improvement or landscape ecosystem management objectives.

PC#: 69
Public Concern: The Huron-Manistee National Forests should work cooperatively with the Michigan Department of Natural Resources coordinating and scheduling of red pine harvest and regeneration to avoid a boom and bust cycle, thus, assuring a steady supply of red pine to the forest products industry.

Response: The Huron-Manistee National Forests agree that the Forest Service should work cooperatively with other landowners and land managers. While the Forest Service only has jurisdiction on National Forest System lands, the agency will strive to work cooperatively with others to address landscape-level issues, such as habitat availability and timber supplies.

PC#: 70
Public Concern: The Final Environmental Impact Statement should complete and disclose the results of a timber market survey as the findings would show much more potential for red pine volume production.

Response: Huron-Manistee National Forests' personnel assessed the timber supply and historic timber consumption information as provided in the Social and Economic Assessment for the Michigan National Forests. This report characterizes the social and economic environment for the Ottawa, Hiawatha, and Huron-Manistee National Forests. Information contained in the report assisted the Forests' personnel in assessing and deriving resource demand (Larry Throop, Assessment for the Demand of Timber Goods and Services from the Forests, September 27, 2004; and, Larry Leefers, Timber Consumption (Demand) and Modeling for the Huron-Manistee National Forests, Department of Forestry, Michigan State University).

Overall, demand for timber products has increased only moderately since the 1986 Forest Plan was approved. The demand for timber products is estimated to continue to increase slightly through the next planning period for most products, mainly due to increased populations both nationally and locally. Red pine pulpwood and sawtimber and northern hardwood sawtimber are the exceptions. The prediction is that demand will remain moderate and will be relatively elastic on the Forests, meaning that the competitive price will be primarily driven by the broader marketplace and not by output levels from these Forests.

The Selected Alternative strives to achieve a balance in the amount of timber scheduled for harvest with consideration for other resources. The Forests also recognized the need for ecosystem restoration and landscape-level management of resources to promote species viability and to enhance ecosystem function.

Conifer – Swamp Forest Types:

PC#: 71
Public Concern: The revised Forest Plan should provide for increased management of cedar swamps and lowland hardwoods because lack of management will result in conversion to tag alder, which will have a negative effect on deer winter habitat.

Response: Cedar is a long-lived species and is not likely to succeed to other forest types in the planning horizon, 50 years, nor are lowland hardwoods anticipated to succeed to other forest types.

It is desirable to maintain existing cedar communities. However, it is very difficult to establish new stands of cedar economically on a landscape scale. It is anticipated that cedar swamps will continue to provide thermal cover and browse for deer into the future. Therefore, the Forests have elected not to try to regenerate cedar. The harvest projection for lowland conifer and lowland hardwoods in the next planning period is very limited. The potential impacts of the proposed level of harvest was analyzed and disclosed in the Final Environmental Impact Statement, pages III-165 to III-167 for cedar and pages III-218, III-243, among other locations.

Specifically for deer, management activities on state, federal and private lands, for example, habitat manipulation, timber harvesting and agriculture, create early successional habitat. This habitat provides for large populations of herbivores. These large populations lead to serious negative impacts from herbivory, especially from deer, on cedar swamp communities. Another negative impact is the result in an increase in deer herbivory in areas in close proximity to the restored 68,500 acres of barrens and prairies. It is not known how many cedar swamps would be located close enough to restored open lands to be impacted (Final Environmental Impact Statement, page III-167).

Overall, the Selected Alternative best meets long-term goals and objectives for the Huron-Manistee National Forests, integrating biological, social, and economic factors into a comprehensive strategy aimed at protecting and enhancing sustainability, diversity, and productivity of the Forests' resources.

Cooperative Management and Collaboration:

PC#: 72
Public Concern: The Little River Band of Ottawa Indians is willing to provide to the Huron-Manistee National Forests data on mottle sculpin and brook trout taken from fish sampling sites.

Response: The brook trout and the mottled sculpin have been selected as Management Indicator Species (Appendix G, Final Environmental Impact Statement). The Huron-Manistee National Forests appreciate the data-sharing offer and are eager to work cooperatively to address natural resource management issues.

PC#: 73
Public Concern: The Department of Natural Resources and the Huron-Manistee National Forests should cooperate in the planning and management of respective public land and resources in the northern Lower Peninsula.

Response: As stated in the revised Forest Plan, page I-9: Principle 2: it is the Huron-Manistee National Forests' intent and desire to coordinate as suggested. Specifically, the Huron-Manistee National Forests will coordinate management activities with the appropriate local, state, or tribal governments as well as other federal agencies.

The Huron-Manistee National Forests anticipates that there will be some differences in management direction because of differences between agencies in laws, regulations, and policies.

PC#: 74
Public Concern: The revised Forest Plan should encourage partnerships with other federal agencies, tribes, and organizations, particularly in watershed restoration efforts.

PC#: 75
Public Concern: The Huron-Manistee National Forests should recognize the potential of volunteers.

Response: The Forest Service recognizes the importance of partnerships in implementing the goals and objectives of the Forest Plan. The revised Forest Plan is permissive with respect to the involvement of volunteers when deemed advisable, provided the arrangement is in accordance with laws, regulations and policies (revised Forest Plan, page I-9: Principle 2).

Deer and Grouse Emphasis Areas:

PC#: 76
Public Concern: The revised Forest Plan should manage aspen across the Forests' landscape, developing good ageclass diversity rather than intensively managing aspen in a few Grouse Management Areas.

Response: Aspen and its management are important to many game and nongame species. Implementation of the Selected Alternative provides for a mix of forest types and age classes to maintain species viability. The Selected Alternative does not emphasize aspen management in Grouse Management Areas over aspen outside of Grouse Management Areas. Aspen in Grouse Management Areas are managed on a 40-year rotation, as compared to a 50-year rotation outside of Grouse Management Areas. Chapter III, page III-178 through 192, of the Final Environmental Impact Statement discusses grouse and the reasons for a shortened aspen rotation in Grouse Management Areas.

PC#: 77
Public Concern: The Huron-Manistee National Forests should harvest aspen to provide deer with a source of food and not reduce acres of Deer Emphasis Areas or clearly state the reason

and the long-term effects for the decrease in Deer Emphasis Area acres. Areas of the Forests should be designated as remote and trophy deer hunting areas.

PC#: 78
Public Concern: The Huron-Manistee National Forests should eliminate Deer Emphasis Areas and substantially reduce Grouse Emphasis Areas acres because over-abundant populations of white-tailed deer are causing a loss of vegetative diversity.

Response: The 1986 Forests Plan allocated Deer Emphasis Areas in which specific management activities are intended to enhance deer habitats. Their importance relates to the provision of critical winter forage requirements and thermal cover through active management. The objectives of Deer Emphasis Areas are to protect isolated, essential areas for deer, which have specific or unique habitat requirements. There are other opportunities outside of the emphasis areas to manage for deer, but this is not the primary objective for these areas (Final Environmental Impact Statement, Chapter III, beginning on page III-199 through 203 Deer Emphasis Areas occur in Management Areas 4.2, 4.3, and 6.2, revised Forest Plan).

Deer Emphasis Area acreages were decreased because of the re-designation of former Deer Emphasis Areas to Management Areas 4.2KW (Kirtland's Warbler Management Area), 6.1 (semiprimitive nonmotorized), and 9.1 (Candidate Research Natural Areas) (Need for Change, September 18, 2003).

The effects of the re-designation are discussed on page 201chapter III, Final Environmental Impact Statement. The particular discussion is repeated here for the convenience of the reader. The re-designation would make management specifically for deer within these areas unlikely. Management direction for 4.2KW under Alternatives B and C would result in a reduction in quality forage for deer and would not provide for optimal thermal cover. It is likely that Deer Emphasis Areas re-designated as 9.1, Candidate Research Natural Areas, were already part of the old-growth design, and, therefore, would not have been actively managed for early successional species. Re-designation of the Deer Emphasis Areas to other Management Areas would not limit early successional habitat management and, therefore, would not limit the ability to continue to manage for deer habitat requirements. Overall, these alternatives would have a potential long-term affect on deer populations, which could affect recreational activities such as hunting and wildlife viewing.

Semiprimitive nonmotorized areas are intended to provide remote recreational opportunities including hunting. Trophy hunting areas and bait-prohibited areas are regulated by the State of Michigan, and are thus, outside the jurisdiction of the Forest Service and the Forest Plan revision process.

An actual elimination, of or reduction in, acreage of Deer, Grouse, and Wildlife Emphasis Areas was not identified as a Need for Change issue (Notice of Intent, September 18, 2003) and thus, is not within the scope of the plan revision. Deer Emphasis Areas make up only a small percentage, approximately 2 to 4 percent, of the total area of the Huron-Manistee National Forests. These areas are primarily managed to provide winter thermal cover, and this habitat only has a minor impact on local deer numbers in most years. Overall, however, there would be increased

herbivory from deer, as noted in numerous locations in the Final Environmental Impact Statement, Chapter III, pages III-255 through 258, among others.

The revised Forest Plan provides a balance between competing demands for use of the Forests' resources. Despite a reduction in the amount of Deer Emphasis Area acres, the projected harvest of aspen, and other tree species outside of old growth and deer emphasis areas, will maintain the viability of white-tailed deer on the Huron-Manistee National Forests. The Selected Alternative requires the establishment and maintenance of 58,500 acres of barrens, prairies, or savannahs and 2,000 acres of fuelbreaks. This is likely to increase adverse impacts due to herbivory from white-tailed deer. In addition, many management activities such as, habitat manipulation, timber harvesting, and agriculture on state, federal, and private lands create early successional habitat. This habitat provides for large populations of deer. These large populations lead to localized negative impacts from herbivory.

Disturbance Regimes – Wildfire:

PC#: 79
Public Concern: The revised Forest Plan places too much emphasis on fire suppression and reduced fuel loads through timber harvesting. The Forest Service must recognize the vital role that fire has in the ecosystem, and try to return some of these natural disturbance regimes to the area.

Response: Many of the ecosystems of northern Michigan are disturbance-related systems that need some type of disturbance to keep them in balance. In the distant past, that disturbance was wildfire. That wildfire intensity level is not possible today because of health, safety, and protection of private property concerns. Therefore, carefully planned and controlled timber harvest is often used as the disturbance agent.

The types of harvest identified in the revised Forest Plan and Final Environmental Impact Statement create conditions similar to various types of natural disturbances. Although timber harvesting, particularly clearcutting, is not the same as the historic natural disturbances, it does provide the necessary conditions for establishing and growing species that characteristically were regenerated by stand replacement type disturbances that created open conditions.

As discussed throughout the Final Environmental Impact Statement, Chapter III, including pages III-48 and III-49, fire will be used to increase forest health, restore ecosystem processes, and to accomplish site preparation. Timber harvest will be the tool used to meet vegetation objectives, often in conjunction with prescribed fire. Prescribed fire is one of the most effective and efficient practices for fuel reduction programs to reduce wildfire severity. Prescribed fire is also used to prepare sites for natural regeneration, and for special wildlife management needs for species such as the Kirtland's warbler and the Karner blue butterfly. The Forests believe that the revised Forest Plan balances multiple uses. The vegetative objectives of the revised Forest Plan were developed to address all aspects of forest management.

Document Organization and Corrections:

PC#: 80
Public Concern: The Final Environmental Impact Statement should present Kirtland's warbler, Indiana bat, and Karner blue butterfly information in summary form at the beginning of the Endangered and Threatened Species section or at the beginning of the species-specific sections to make the information more accessible.

Response: We appreciate your comment. The Forests evaluated your comment and believe that the information is organized sufficiently.

PC#: 81
Public Concern: The Huron-Manistee National Forests' website should include the Notice of Availability of the Final Environmental Impact Statement and the revised Forest Plan. The comment deadline could not be established because the Notice of Availability is the only document indicating the date.

Response: While it is true that Huron-Manistee National Forests' website did not include the Federal Register Notice of Availability, the Forests sent a Forest Plan revision newsletter and postcard to approximately 1,300 individuals, businesses and organizations whose names are maintained on the revision mailing lists. Both indicated the availability of the draft documents, the timeframe for submitting comments, the website address and telephone number for obtaining these documents. The Forest Plan revision newsletter, as well as the draft documents, has been posted on the website since early March 2005.

PC#: 82
Public Concern: The revised Forest Plan, Alternatives A and B maps, should correct the error that depicts part of the proposed study area (9.2) on the Pine on Map B includes portions of the Pine that are part of the National Wild & Scenic River section.

Response: Both maps are correct. Map A includes all of the designated Scenic River from Lincoln Bridge to one mile above Stronach Dam, and the portion from one mile above Stronach Dam to Low Bridge. This is consistent with the decision to manage the river from Lincoln Bridge to Low Bridge as described in Amendment #23. Map B describes the designated portion of the river as Management Area 8.1 and the portion from Stronach to M-55 as Management Area 9.2.

PC#: 83
Public Concern: I oppose all proposed plans, because none of them does a viable job of managing the forest for all users of these resources: man, wildlife, and timber.

Response: The National Forest Management Act of 1976 requires that all National Forests develop and implement a Forest Plan. The Huron-Manistee National Forests believe that the Selected Alternative best meets long-term goals and objectives for the Huron-Manistee National

Forests, integrating biological, social, and economic factors into a comprehensive strategy aimed at protecting and enhancing sustainability, diversity, and productivity of the Forests' resources.

PC#: 84
Public Concern: The Huron-Manistee National Forests should improve the maps accompanying the Forest Plan; they are unclear in the Brandy Brook area.

Response: The revised Forest Plan was adjusted to clarify the Management Areas map labeling for the Brandy Brook area. The Management Area designations within Brandy Brook are repositioned to the west of Lake Mitchell, within MA 6.2D (Alternative B) and MA 6.1D (Alternative C).

PC#: 85
Public Concern: The Huron-Manistee National Forests should include a bibliography and information on where copies of the studies referenced in the Forest Plan and Final Environmental Impact Statements can be found.

Response: The Huron-Manistee National Forests have provided the full citation for all reference materials referred to in the revised Forest Plan, Appendix F and in the Final Environmental Impact Statement, Appendix J. The Forests will assist individuals in attaining specific unpublished materials if the need arises.

PC#: 86
Public Concern: The Huron-Manistee National Forests should not have pseudo-management areas such as remote area habitat, without adequate disclosures on the ½ inch to 1-mile road maps or management direction outlines and narrative.
Response: The Huron-Manistee National Forests are not proposing remote area habitat management areas in the Forest Plan revision Process.

PC#: 87
Public Concern: The National Forest Management Act requires each Forest Plan to contain Standards and Guidelines for each management prescription for each management area, which provides important boundaries on the actions of the agency in implementing the plans. Each management prescription should contain its own Standards and Guidelines, and they should be clear, appropriately detailed so that the public can have a good idea of what is being planned, and enforceable. Vague, broad statements, which include terms, like "should or may" or "at the discretion of," are unenforceable. These kinds of Standards and Guidelines do not provide any boundary on agency action and do not comply with the requirements of the law.

Response: Standards and Guidelines are not a requirement of the National Forest Management Act. Rather, they are required in the resource management planning regulations, Department of Agriculture, Forest Service, 36 CFR Part 219. Section 219.11, Forest Plan Content, (c). This section states that each management area will have multiple use prescriptions and associated Standards and Guidelines. The Huron-Manistee National Forests believe that the Standards and Guidelines in its revised Forest Plan comply with all appropriate laws, regulations, and policies.

The Forest Plan is intended to provide broad strategic direction to assist the Forests in attaining management objectives. Standards and Guidelines (*see* definitions below) are intended to facilitate implementation of the Forest Plan at this broad strategic level. Individual management actions undertaken to implement the Forest Plan are subject to site-specific environmental analysis and documentation and public involvement.

Standards and Guidelines are defined in the revised Forest Plan, Glossary, Appendix F, page F-48. *Standards* are requirements found in a forest plan, which impose limits on natural resource management activities, generally for environmental protection. Standards are required limits to activities. These limitations allow the Forests to reach the desired conditions and objectives. Standards also ensure compliance with laws, regulations, executive orders, and policy direction. Deviations from Standards must be analyzed and documented in Forest Plan amendments.

However, *Guidelines* are preferable limits to management actions that may be followed to achieve desired conditions. Guidelines are generally expected to be carried out. They help the Forests to reach the desired conditions and objectives in a way that permits operational flexibility to respond to variations over time. Deviations from Guidelines must be analyzed during project-level analysis and documented in a project decision document, but deviations do not require a Forest Plan amendment.

PC#: 88
Public Concern: The Huron-Manistee National Forests should designate other areas on the Forests as Management Area 7.1: Concentrated Recreation Area. Does the 7.1 designation apply to only non-motorized uses? We currently have some areas on the Forest that would meet the criteria of concentrated motorized areas. Why were these not considered for a concentrated motorized recreation area designation, for example, “7.2 concentrated motorized”?

Response: The Concentrated Recreation Management Area designation does not only apply to non-motorized uses but can be used for any high-density, self-contained forest recreation environment, for example, downhill ski resorts.

The Huron-Manistee National Forests do not know which areas the commenter is suggesting should be considered for a concentrated recreation designation so it is not possible to respond specifically to this question. However, the Huron-Manistee National Forests evaluated all Management Area designations during Forest Plan revision. There is only one location on the Huron-Manistee National Forests where designated trail densities are high enough to warrant a designation of Concentrated Recreation Management. This area, Corsair Recreation Area, formerly the Silver Creek semiprimitive nonmotorized area, has been designated as a Management Area 7.1, Concentrated Recreation Area.

PC#: 89
Public Concern: The Huron-Manistee National Forests should improve the Draft Forest Plan and Draft Environmental Impact Statement by providing major editorial work. The documents are too voluminous, unorganized, confusing, and hard to review. The simple reasons and basis for decisions are often hard to decipher. Specific suggestions for improving the documents are: 1) prepare an executive summary section where major issues can be addressed with footnoted

references to the body of the Plan; 2) provide an index of both documents; 3) improve the Table of Contents; and 4) include an introductory comparison of the current plan and proposed changes to make it much easier for readers to find issues and details of particular concerns.

Response: The Huron-Manistee National Forests strived to compile the tremendous volume of information contained in the revised Forest Plan and Final Environmental Impact Statement into clear and well-organized documents. We have thoroughly edited both documents, reorganized many sections, and included indices. The revised Forest Plan and Final Environmental Impact Statement have been indexed and additional work has been done to improve the clarity and organization of the documents. An executive summary of the Final Environmental Impact Statement has been prepared. The Forests believe that this additional effort will facilitate understanding of the documents and the location of information pertaining to specific issues within them. We believe that the documents are now more clear, better organized, and easier to use than their draft versions. The Forests do not believe that an executive summary of the revised Forest Plan would be useful.

PC#: 90
Public Concern: The public is presented with a hodge-podge of overlapping and confusing management layers each with its own impacts to recreation. The reader cannot determine what management prescriptions apply to their choice of recreational activity at any given place, let alone the rationale the Huron-Manistee National Forests are using for the various management restrictions.

Response: The Forests have tried to make the documents as easy to understand as possible. Forest management and Forests related issues can be extremely complex, and often require detailed analysis and management direction. The revised Forest Plan and Final Environmental Impact Statement were developed not only for public review, but to serve as management direction that Forest Service employees will use to manage the National Forests. As such, some of the management direction must be technical in nature. Those desiring a less complex analysis should refer to the executive summary of the Final Environmental Impact Statement, which provides a quick summary and findings of the analysis. As to specific concerns, the commenter does not provide enough information to respond. However, from the comment we can assume that the commenter has concerns about performing a specific recreational activity at a specific location. Forest Service staff is available to discuss specifics of recreational opportunities available at any given area.

PC#: 91
Public Concern: The revised Forest Plan and the Final Environmental Impact Statement should both be included in consolidated electronic computer files rather than separated into individual chapter files. A Table of Contents for the Final Environmental Impact Statement should be included.

Response: Complete document digital files, rather than by chapter, will be provided on the Website for the Final Environmental Impact Statement and revised Forest Plan
A more thorough table of contents is incorporated into the final documents.

Ecological Classification:

PC#: 92
Public Concern: The revised Forest Plan should consider species site suitability, such as the Kotar methodology, in determining which sites are best suited for aspen.

Response: Sites that are best suited, ecologically, for aspen are determined at the stand level and not in the revised Forest Plan. The Huron-Manistee National Forests use locally developed Ecological Land Type Phases to determine site suitability for aspen. Ecological Land Type Phases were developed within a broader ecological framework. In this system, landscape ecosystems on the Huron-Manistee National Forests are defined by combinations of geologic; vegetative, both overstory and ground flora, soil; hydrologic; and substratum (refer to the Ecological Classification and Inventory of the Huron-Manistee National Forests Field Guide).

PC#: 93
Public Concern: The Huron-Manistee National Forests should define and map aquatic ecological units (watersheds) as discussed in North Central Experiment Station General Technical Report NC-176.

Response: The Forests are aware of NC-176 and use this resource on a case-by-case basis when appropriate. However, at present, this Ecological System is not used as the basis for planning by the Huron-Manistee National Forests. In Region 9, the fifth level watershed is used as the basis for planning purposes. Thus, the system is not described in the revised Forest Plan or Final Environmental Impact Statement. Fifth level watersheds are described in the Final Environmental Impact Statement on page III-3 and displayed in Figure III-1. As new information becomes available, the Forests will continue to evaluate the possibilities of incorporating new Ecological Classification Systems for planning for aquatic resource management.

Economic and Social Impacts:

PC#: 94
Public Concern: The Huron-Manistee National Forests should recognize the economic and social impact of timber management in generating revenues, in the contribution to local communities' economy, and to wildlife based recreation.

Response: The Selected Alternative strives to achieve a balance between, and integration of, ecological, economic, and social factors into a comprehensive strategy aimed at protecting and enhancing sustainability, diversity, and productivity of the Huron-Manistee National Forests' natural resources. There are many methods or tools used in achieving this balance, including harvesting of timber. As such, timber harvest is a part of management of National Forest System lands, and potential economic impacts are disclosed in the Final Environmental Impact Statement, pages III-329 to III-348. The Huron-Manistee National Forests considered an alternative that would maximize the production of timber products (see page II-3, Final Environmental Impact Statement). This Alternative was eliminated from detailed study and further consideration because it failed to respond effectively to Forests' issues or to public

comments received. Maximum timber production was also evaluated under the maximum timber benchmark (Final Environmental Impact Statement, Appendix A).

PC#: 95
Public Concern: The preferences seemingly being given to fiscal profits over healthy growth and protection of our resources are alarmingly shortsighted…the direction, which seems to have been given to make profit even if wildlife is adversely affected, is disgraceful.

Response: Under Alternatives B and C, the objectives of forest management include restoration of ecosystems and providing for the viability of animal and plant species. Timber harvesting is one of the tools to accomplish these objectives. There are varieties of methods to achieve this objective, with timber harvest being one of many successful tools. The Huron-Manistee National Forests' revised Forest Plan is designed to achieve a balance between ecological, social, and economic needs.

PC#: 96
Public Concern: The Huron-Manistee National Forests should promote tourism by not requiring hunting and fishing guides to obtain a permit to operate.

Response: Commercial operations on National Forest System lands are required to have special use permits under 36 CFR 261.10. Hunting and fishing regulations and issuance of outfitter guide permits are administrative processes beyond the scope of Forest Planning.

PC#: 97
Public Concern: The Huron-Manistee National Forests should manage the bidding and leasing process of concessionaire operated campgrounds fairly and honestly. Rustic campgrounds are not meeting their potential in revenue compared to the recreational experience.

Response: The Huron-Manistee National Forests evaluated area recreational assets and demands. A Recreation Niche Statement was prepared, that, in part, emphasizes water-based recreational activities. The Forests intent is to maintain ownership on lands adjacent to water for general public use and enjoyment, and to provide opportunities that are more rustic in nature. The revised Forest Plan and the Recreation Niche do not specifically recommend that the Forests establish highly developed campgrounds. Highly developed recreational opportunities appear to be adequately provided for by the private sector.

However, the Forests do operate developed recreation sites. Many of the developed recreation sites on the Forests charge a fee and are managed in accordance with the Forests' implementation of the Federal Lands Recreation Enhancement Act. These are maintained and managed by the Forest Service. Some campgrounds are operated under a special use permit by a concessionaire. These permits are issued using a competitive bidding process and are administered by the Forest Service.

PC#: 98
Public Concern: The Michigan Department of Natural Resources should advertise which lakes are stocked with fish and stock those lakes that are closest to private tourist businesses.

Response: The Michigan Department of Natural Resources is responsible for the management of the state's fisheries, including stocking of lakes and streams. This issue is outside the scope of the Forest Plan revision process.

Endangered, Threatened, and Sensitive Species - General:

PC#: 99
Public Concern: The Forest Plan should be flexible in allowing other agencies or organizations to conduct surveys of lakes and streams during restricted periods designed to protect loons and eagles.

Response: The evaluation of protective measures for endangered, threatened, and sensitive species is done on a site-specific basis. These site-specific analyses will continue to be done in cooperation with other state, local, and federal governmental agencies.

PC#: 100
Public Concern: The revised Forest Plan should contain more stringent Standards and Guidelines to protect threatened and endangered species; the Final Environmental Impact Statement does little to prove species are viable.

Response: As part of the Forest Plan revision process, the Huron-Manistee National Forests conducted a Species Viability Evaluation (Appendix B, Final Environmental Impact Statement). Because of this evaluation, Conservation Measures, Standards and Guidelines, and management direction were incorporated into the revised Forest Plan to provide for minimum viability of all Management Indicator Species, Regional Forester sensitive species, federal and state listed species, and for all native and desirable non-native species. Many of the specific items identified in the Need for Change process and carried forward into the Notice of Intent specifically addressed species viability. Accordingly, specific conservation measures to maintain the viability of native and desirable non-native species were developed and incorporated into the revised Forest Plan (2600 Wildlife, Fish, and Sensitive Plant Habitat Management, page II-23, revised Forest Plan). The effects of implementation of said conservation measures are disclosed in the Environmental Impact Statement for the revised Forest Plan.

PC#: 101
Public Concern: The Huron-Manistee National Forests should omit the statement "as well as those species proposed to be listed" on page II-24 of the Forest Plan. The [endangered and threatened species] lists are long enough without including the "proposed" species. It is reasonable to include the Indiana bat in the "desired future condition" of the Forest, but the specifications that manipulate management of the forest in order to raise more bats are not reasonable.

Response: The Huron-Manistee National Forests are required by law, regulation, and policy for example, the Endangered Species Act, 36 Code of Federal Regulations 219.19 and 219.9, and Departmental Regulations 9500-4 to maintain the viability of native and desirable non-native species. Strict regulations are in place regarding management for federally threatened and endangered species and their habitats on National Forest System Lands. (16 U.S.C. 1534 et seq.)

Section 7 directs Federal departments and agencies to ensure that actions authorized, funded, or carried out by them are not likely to jeopardize the continued existence of any threatened or endangered species, or result in the destruction or adverse modification of their critical habitats (16 U.S.C. 1536 et seq.). Federal agencies also must consult with the Secretary of the Interior, on non-marine species, or the Secretary of Commerce, on marine species, whenever an action authorized by such agency is likely to affect a species listed as endangered or threatened or to affect its critical habitat. The act mandates conference with the appropriate Secretary whenever an action is likely to jeopardize the continued existence of any species proposed for listing as endangered or threatened, or whenever an action might result in destruction or adverse modification of critical habitat proposed for listing (16 U.S.C. 1536(a)4).

PC#: 102
Public Concern: The Huron-Manistee National Forests should include Standards and Guidelines for the 10 aquatic Regional Forester sensitive species (including lake sturgeon, creek heel splitter, pugnose shiner, and channel darter) in the Forest Plan.

Response: To improve organization and facilitate implementation, the revised Forest Plan has been reorganized such that some items formerly located in the Standards and Guideline sections are now located under "Goals, Objectives, and Desired Future Conditions" at the beginning of Chapter II. This section provides the Huron-Manistee National Forests with the direction necessary to manage appropriately habitat for the ten aquatic Regional Forester Sensitive Species mentioned in the comment. Specifically, general protection and enhancement measures for the aquatic sensitive species are implicit in the following Forest-side goals and objective (Chapter II, page II-3 and desired future conditions Chapter II, page II-6). These are:

- Wildlife and fisheries habitats and plant communities shall be managed to maintain viable populations of existing native and desired non-native species.
- Maintain or improve the populations of endangered, threatened, or sensitive species or communities.
- Manage riparian areas consistent with resource conditions, management objectives and designated water use. Reduce nonpoint pollution to the maximum extent feasible and protect the hydrologic functions of watersheds, including both surface and groundwater systems.
- Manage oligotrophic lakes with 100 percent of National Forest ownership so as not to change the trophic status; allow no more than a 10-percent decline in trophic status in other oligotrophic lakes and lakes with a mesotrophic status; lakes with a eutrophic status will maintain fishable and swimmable waters.
- Maintain favorable conditions of water flow and quality. Management practices will not result in a decline in water quality conditions.
- Habitat needs of riparian-dependent species are met and maintained, especially habitat for endangered, threatened, and sensitive species.

Endangered, Threatened, and Sensitive Species - Ginseng:

PC#: 103
Public Concern: The Huron-Manistee National Forests should not forego management of good quality northern hardwood stands for ginseng. Not actively managing these stands is not beneficial to the forest products industry.

Response: Ginseng is very rare on the Huron-Manistee National Forests (Final Environmental Impact Statement, Appendix B, page B-10). There exists only a small portion of the Huron-Manistee National Forests that is potentially suitable habitat for ginseng. This amounts to approximately 22,500 acres, or about 2 percent of the Forests. The revised Forest Plan Standards and Guidelines specify managing 80 percent of potential ginseng habitat for conditions that are likely to support viable ginseng populations. The Forests are mandated by law to protect viability of species on National Forest System lands, while striving to meet other ecological, economic, and social needs. The Selected Alternative strives to achieve such a balance. Potential impacts to other resources, including economic impacts, were analyzed and disclosed in Chapter III of the Final Environmental Impact Statement, pages III-174 through III-177.

The Forests also recognized the need for ecosystem restoration and landscape-level management of resources to promote species viability and to enhance ecosystem function. The Selected Alternative attempts to ensure the distribution, abundance, and habitat requirements of species adapted to mature forest as well, and for those requiring large opening complexes.

Endangered, Threatened, and Sensitive Species – Indiana Bat:

PC#: 104
Public Concern: The Forest Plan should restrict cutting of standing dead trees within suitable Indiana bat habitat at any time during the year and not just from May 1 to August 31.

Response: We agree and have modified Standard and Guideline in revised Forest Plan, Chapter II, 2600, II, C, 3 – Indiana Bat, to include the following:

- Within the five-mile radius around Tippy Dam – Tippy Management Zone, firewood permits will be prohibited.

In addition, the current Manistee National Forest Firewood Permit Program provides a map showing areas closed for standing dead firewood collection from May 1 through August 31. This map is provided to all firewood permit holders.

PC#: 105
Public Concern: The Forest Plan should coordinate with Indiana bat management actions and protective measures listed in the Biological Evaluation, as they are different. These measures include:

1. Regeneration units will be designed with irregular borders to provide edges for solar exposure of roost sites, interspersion of roosting and foraging habitat, and travel corridors.
2. Survey and document pre- and post-harvest roost tree conditions, including inventory and protection measures.
3. Create or renovate upland water sources for Indiana bat by developing water holes in wildlife openings along the forest edge; designating Maintenance Level 1 and decommissioned roads to provide upland water sources; designing road construction and reconstruction projects to include small waterholes adjacent to the road, where feasible.
4. Manage the 5-mile (8-km) radius around Tippy Dam to best benefit the bat.
5. Habitat removal and modification to include considerations for minimizing potential adverse impacts, such as visual assessments of roosting habitat quality (exfoliating bark, splits/cracks, hollows, holes, dens, and cavities) or other assessment techniques such as mist-netting.
6. Habitat removal and modifications will employ seasonal avoidance measures, as feasible and prudent.
7. Site-specific project protection measures will be developed during biological evaluations to identify appropriate protection measures.

Response: The following list corresponds to the numbered items above:

1. Added Standard and Guidelines to revised Forest Plan, Chapter II, 2600, II, C – Indiana Bat.
    - Regeneration units will be designed with irregular borders to provide edges for solar exposure of roost sites, interspersion of roosting and foraging habitat, and travel corridors.
2. This will be included in revised Forest Plan Monitoring and Evaluation Implementation Guide as stated in the revised Forest Plan, Chapter IV.
3. Added Standard and Guideline to revised Forest Plan, Chapter III, Management Areas 2.1, 4.2, 4.4, and 6.1, Section 2600, I, General Management:
    - Provide for waterhole development or restoration in Management Areas 2.1, 4.2, 4.4, and 6.2.

    - Added Standards and Guidelines to Chapter II, 2600, II, C, 9 – Indiana Bat:
        - Upland Water Sources will be provided for the Indiana Bat by:
            - ✓ Developing water holes in wildlife openings along the forest edge.
            - ✓ Utilize maintenance level 1 and decommissioned roads to provide upland water sources, where feasible.
            - ✓ Designing road construction and reconstruction projects to include small waterholes adjacent to the road, where feasible.

4. Added to Goals, Objectives, and Desired Future Conditions section of revised Forest Plan, Chapter II - Natural Resources.
5. Standards and Guidelines exist in the revised Forest Plan, Chapter II, and 2600 II C - Indiana Bat.
6. Standards and Guidelines exist in the revised Forest Plan, Chapter II, and 2600 II C - Indiana Bat.
7. Standards and Guidelines exist in the revised Forest Plan, Chapter II, and 2600 II C - Indiana Bat.

Endangered, Threatened, and Sensitive Species – Karner blue Butterfly:

PC#: 106
Public Concern: The revised Forest Plan should coordinate with Karner blue butterfly management actions and protective measures listed in the Biological Evaluation, as they are different. These measures include:

1. Trail construction, road construction, and vegetation management activities will be designed to improve potential Karner blue butterfly habitat. Roads and trails will be managed and maintained in a manner to protect areas with wild lupine. Where this is not feasible and damage is occurring, trails and roads may be relocated or decommissioned.
2. Provide dispersal corridors in order to facilitate dispersal between occupied and unoccupied areas (suitable habitat sites).
3. Activities will be scheduled and completed when they are least likely to impact any life stage of the butterfly.
4. Watershed management activities that are incompatible with Karner blue butterfly will be excluded.

Response: The following changes correspond to the items listed in the concern and were made to the revised Forest Plan:

1. Added Standard and Guideline to the revised Forest Plan, Chapter II, and 2600, II, G, 3 - Karner blue butterfly:
    - Roads and trails may be relocated or decommissioned, as deemed necessary to protect wild lupine.
2. Added Standard and Guideline to the revised Forest Plan, Chapter II, 2600, II, G, 5 - Karner blue butterfly:
    - Provide dispersal corridors in order to facilitate dispersal between occupied and unoccupied areas (suitable habitat sites).
3. Standards and Guidelines exist in the revised Forest Plan, Chapter II, 2600, II, G - Karner blue Butterfly which provide timing restrictions for activities that are likely to impact the Karner blue Butterfly.
4. Added Standard and Guideline to the revised Forest Plan, Chapter II, and 2600, II, G, 2- Karner blue butterfly:
    - Resource management activities, such as road and trail construction and vegetation management, will be designed to protect and improve potential Karner blue butterfly habitat.

PC#: 107
Public Concern: The Forest Plan should depict a measure for: (1) total amount of habitat to be managed for recovery and non-recovery Karner blue butterfly populations and (2) habitat management targets by decade to meet these goals.

Response: Clarifications of the amount of habitat restoration to occur in the metapopulation areas and in the essential Karner blue butterfly habitat areas, non-recovery, were made to the revised Forest Plan, Final Environmental Impact Statement, and the Biological Assessement:

- Revised Forest Plan, Chapter II, 2600, IV - Management Indicator Species, B - Karner blue Butterfly.
- Final Environmental Impact Statement, Chapter III, Affected Environment and Environmental Consequences.
- Biological Assessment, Karner blue Butterfly Effects Section.

In general, approximately 7,000 acres of barrens restoration are planned to occur during the first decade. While not specific to the metapopulation areas or essential Karner blue butterfly habitat areas, it is expected that 60 percent would occur in the metapopulation areas and 40 percent would occur in the essential Karner blue butterfly habitat areas.

Endangered, Threatened, and Sensitive Species - Kirtland's warbler

PC#: 108
Public Concern: The Huron-Manistee National Forests should not implement a large increase in Kirtland's warbler habitat when the recovery objective of 1,000 pairs has been exceeded at the same time when Golden-Winged Warbler habitat is being severely diminished by the loss of aspen.

Response: The Kirtland's warbler is a federally endangered species, and the golden-winged warbler is not. The significant increase in the Kirtland's warbler population in recent years has been on State of Michigan lands. Only in the past three years has the Huron-Manistee National Forests met its minimum goal of 420 pairs. A Species Viability Analysis indicated that more habitat management is required to maintain or exceed these numbers over the long-term (Final Environmental Impact Statement, Appendix B). This will also continue to meet the requirements as outlined in the Kirtland’s Warbler Recovery Plan. In addition, the Selected Alternative emphasizes managing habitat for the golden-winged warbler (Final Environmental Impact Statement, Appendix B, Table B-3, surrogate species for shrub/scrub wetlands and early successional aspen/birch).

PC#: 109
Public Concern: The Final Environmental Impact Statement and the Forest Plan should clarify the amount of essential Kirtland's warbler habitat is being proposed, i.e., Environmental Impact Statement, page II-13, Table II-2 states that the Selected Alternative will increase the amount of Kirtland's warbler essential habitat to 135,965 acres. However, page II-32 of the Forest Plan and page 80 of the Biological Evaluation states that this alternative will reach a breeding habitat goal of 88,300 acres.

Response: We agree this was an error. The text has been changed in Chapter II of the Final Environmental Impact Statement to be consistent. Table II-2 was corrected to reflect the correction acreage of 88,300 acres. The 135,965 acres is the total acres in Management Area 4.2 that is considered Kirtland's warbler habitat. Not all of Management Area 4.2 is essential habitat.

PC#: 110
Public Concern: The Forest Plan should not dedicate so many acres and tax dollars to intensive, single-species management such as the Kirtland's warbler. Very specific and repetitious warbler habitat conditions must be created through artificial treatments and other bird competitors of the Kirtland's warbler must be baited, trapped, and killed. The law is flawed and the species should be capable of living in the natural environment.

Response: The revised Forest Plan and the Final Environmental Impact Statement disclosure reflect the management necessary to meet recovery goals and laws mandated by the Endangered Species Act. Essential habitat needed to meet these mandates includes 20 percent, rather than 30 percent, of that habitat type on the Forests. Although essential for the Kirtland's warbler, this habitat type is also vital for other plant and animal species and, thus is beneficial on a larger ecosystem scale. All the management activities are designed, as best possible, to mimic natural wildfires that are now suppressed to protect human life and property. Please refer to the Final Environmental Impact Statement, page III-46, for disclosure of potential effects from this management activity.

PC#: 111
Public Concern: The Final Environmental Impact Statement should clarify contradictory statements about recovery objectives for Kirtland's warbler, i.e., the Final Environmental Impact Statement, page III-59 states an objective of 1,000 pairs and later states that the minimum objective is 420 pairs.

Response: One thousand pairs of Kirtland's warblers is the recovery objective throughout its known range including National Forest System land and State Forest land, as well as Fish and Wildlife Service land. The objective of 420 pairs is the goal on the Huron-Manistee National Forests only (Final Environmental Impact Statement, page III-58 to 61).

PC#: 112
Public Concern: The Final Environmental Impact Statement should disclose whether nest parasitism by the Brown-headed cowbird is a concern and could be increased by creating barrens, savannahs, and prairies on the Forests.

Response: Cowbird parasitism may increase because of barrens creation, particularly on the Manistee National Forest. Cowbird control continues to be implemented on the Huron National Forest for the Kirtland's warbler and is likely to have benefits outside the Kirtland's Warbler Management Areas. However, barrens creation is still likely to have some negative effect on the Huron National Forest. Effects are discussed in the habitat groups of the Final Environmental Impact Statement, including the Pine Barrens habitat group and Savannah, Oak-Pine Barrens, habitat group.

PC#: 113
Public Concern: The Forest Plan should explicitly state that the annual target for Kirtland's warbler is to provide breeding habitat for a minimum of 420 pairs of Kirtland's warblers through sustained harvest and regeneration of an average of 1,600 acres annually.

Response: The revised Forest Plan, Chapters II and III, display Goals and Objectives, Desired Future Conditions and Standards and Guidelines to reflect Kirtland's warbler breeding habitat by decade. This decadal goal is reflective of an objective of approximately 1,600 acres of essential breeding habitat created each year. It is anticipated that approximately 15,960 acres of essential breeding habitat will be available at any one time into the future. This will enable the Forests to provide for a minimum of 420 pairs of Kirtland's warblers.

Endangered, Threatened, and Sensitive Species – Piping Plover:

PC#: 114
Public Concern: The Forest Plan should prohibit fireworks within 3,281 feet (1000m) of active piping plover nests, require that pets to be on a leash within piping plover critical habitat, and include the most up-to-date information regarding piping plover status in the Biological Evaluation.

Response: Discharge of fireworks anywhere on National Forest administered lands across Region 9 is prohibited by 36 CFR 261.52. Therefore, protection is afforded to piping plover and it is not repeated in the revised Forest Plan Standards and Guidelines.

The Biological Assessment data was updated to include 2005 piping plover census data that the Forest Service obtained from the 2005 Piping Plover Coordination Meeting.

Endangered, Threatened, and Sensitive Species – Pitcher's Thistle:

PC#: 115
Public Concern: The Forest Plan should include the following measures in regards to Pitcher's Thistle:

1. Limit foot travel in areas occupied by Pitcher's thistle; design foot traffic on dunes to limit impacts to Pitcher's thistle.
2. Limit Off-Highway Vehicle traffic to trails. (Management Areas 4.2 and 4.3 only).
3. Close some roads into Pitcher's thistle areas (Management Areas 4.2 and 4.3 only).
4. Apply a management direction that indicates that prescribed burning will be very unlikely to be used in dune habitats.
5. Prohibit watershed management activities in Pitcher's thistle habitat.
6. Control introduced species.
7. Provide protective/informative signage for public.
8. Increase law enforcement to protect Pitcher's thistle.

Response: The following changes correspond to the items listed in the above concern and were made to the revised Forest Plan:

1. Added Standards and Guidelines to the revised Forest Plan, Chapter II, 2600 II H-Pitcher's thistle which are currently identified in Chapter III, Management Areas 4.2, 4.3, and 5.1.
   Added Standard and Guideline:
   - Limit foot traffic within specific areas of the dune ecosystem where Pitcher's thistle occurs.
2. Limiting Off-Highway Vehicle traffic is current Forest Service policy and is not repeated in the revised Forest Plan Standards and Guidelines.
3. Added Standard and Guideline to the revised Forest Plan, Chapter II, 2600, II H-Pitcher's thistle:
   - Roads into Pitcher's thistle habitat on National Forest System lands will be closed when appropriate.
4. Added Standard and Guideline to the revised Forest Plan, Chapter II, 2600, II H-Pitcher's Thistle:
   - Limit the use of prescribed burning in dune habitat where Pitcher's thistle occurs.
5. Standard and Guideline exists in revised Forest Plan, Chapter II, 2600, II H - Pitcher's Thistle:
   - Prohibit new resource development and mining in occupied Pitcher’s thistle habitat.
6. Revised Forest Plan, Chapter II, Goals, Objectives, and Desired Future Conditions - Natural Resources identifies this as an objective.
   Replaced the Standard and Guideline in the revised Forest Plan, Chapter II, 2600 II H - Pitcher's Thistle that stated “prohibit pesticide use in occupied Pitcher's thistle habitat” with a new Standard and Guideline that states:
   - Herbicide use will occur only when other methods of control for specific non-native invasive plant species are ineffective. The Biological Assessment addresses effects associated with this change.
7. Revised Forest Plan, Chapter II, Goals, Objectives, and Desired Future Conditions - Health and Safety identifies this as an objective.
8. Modified the revised Forest Plan, Chapter II, Goals, Objectives, and Desired Future Conditions - Health and Safety objective for law enforcement to reflect emphasis on resource protection needs:
   - Provide for Law Enforcement and compliance patrols based on user activity and resource protection needs.

Even-aged Management:

PC#: 116
Public Concern: The Huron-Manistee National Forests should harvest the allowable sale quantity and provide for adequate regeneration of certain desirable, shade-intolerant species, such as cherry, basswood, yellow and white birch by using the clearcut method of timber.

Response: The amount of timber harvested annually is based on a variety of factors such as budget allocations from Congress, staffing levels, and national, regional, and forestwide priorities.

The revised Forest Plan allows for both uneven- and even-aged management techniques. Both techniques have advantages and disadvantages depending upon the particular site and desired management. Both techniques can be prescribed at the site-specific level depending upon the situation, and as such, more site-specific analysis would occur at the project implementation level and disclosed during the environmental analysis process. At 50 years, no individual tree species is expected to be lost in any vegetative class (Table III-22, Final Environmental Impact Statement, pages III-226 – III-228). Some tree species will be reduced in some stands if regeneration cutting does not take place. However, cherry, basswood, and yellow and white birch are expected to occur in the composition of the forest type (Chapter III, Indicator 3 – Use of Management to Influence Within-Stand Complexity, pages III-232 through 242) in stands proposed for regeneration, for example, aspen regeneration.

PC#: 117
Public Concern: The Huron-Manistee National Forests should discontinue clearcutting vast tracts of our national forests (thinning is bad enough). This practice always creates an eyesore.

Response: National Forest Management Act regulations consider even-aged management, or clearcutting, as one of many acceptable silvicultural methods that are used to achieve multiple use objectives in accordance with the Multiple-Use Sustained Yield Act of 1960. Forestwide silvicultural Standards and Guidelines provide for the protection of soils, scenery, aquatic, and recreational resources when using the clearcutting harvest method. Clearcutting is commonly used to regenerate aspen and jack pine because both tree species requires full sunlight for regeneration and is important habitat components for survivability of such species as the endangered Kirtland's warbler. When and where to utilize clearcutting as a tool to meet resource objectives is identified on a site-specific level and is outside the scope of the Forest Plan revision.

Forest Health:

PC#: 118
Public Concern: The Huron-Manistee National Forests should maintain an active timber management program, achieving a more productive, healthy forest with less risk from forest pests, diseases, and wildfires. Table III-23 of the Environmental Impact Statement projects that 47 percent of the forested acres will be over 100 years of age. Shade intolerant forest types, such as cherry, basswood, birch, and oak, will decline as components of forested stands.

Response: The implication of this comment is that the Huron-Manistee National Forests should manage more of the suitable land for timber, resulting in a healthy forest condition. The concept of forest health includes such diverse concepts as viable species, diversity of species, and sustainable ecosystems; all were considered in the development of the range of alternatives. Table H-1, found on Page H-3 of the Final Environmental
Impact Statement, refers to the Total Forest Land Suitable for Timber Production, which is 401,121 acres. These are Spectrum model projections of the amount of tentatively suitable timber lands that are needed to meet the projected allowable sale quantity requirements of 150 years.

The revised Forest Plan is meant to guide management activities for a 10 to 15 year period. It is a dynamic document that will be examined at a minimum of every five years and adjusted when new information becomes available or circumstances change (Chapter I, page I-2, revised Forest Plan). Technically, at 50 years, no individual tree species is expected to be lost in any vegetative class (Table III-22, Final Environmental Impact Statement, pages III-232 through 242). Some species will be reduced in some stands if regeneration cutting does not take place. However, cherry, basswood, birch, and oak are expected to occur in the composition of the forest type (Chapter III, Indicator 3 – Use of Management to Influence Within-Stand Complexity, pages III-232 through 242) in stands proposed for regeneration, for example, aspen regeneration).

Overall, the Huron-Manistee National Forests are managed to provide a variety of ecological conditions and recreational opportunities. Some of these include Research Natural Areas, old growth, campgrounds, non-motorized trails, riparian habitat, and unique areas. All are designed to provide a healthy forest to meet our responsibilities to the public, while meeting all environmental regulations, policies, and laws.

PC#: 119
Public Concern: The Final Environmental Impact Statement should disclose the Forests' forest health condition and current situation, for example, oak wilt, beech bark disease, and emerald ash borer.

Response: The Final Environmental Impact Statement, Chapter III, pages III-41 through 43 discloses the insect and disease situations currently known on the Forests. Standards and Guidelines regarding pest management are included in the revised Forest Plan, Chapter II, Standard and Guidelines, 3400 Forest Pest Management, page II-37. Site-specific species concerns will be addressed through specific management actions.

PC#: 120
Public Concern: The revised Forest Plan should emphasize Integrated Pest Management and create a mosaic of forest types and age classes across the Forests. This is the best means of obtaining healthy forest conditions rather than large barrens and prairie restorations, which are the antithesis of forest health and Integrated Pest Management.

Response: The Selected Alternative strives to achieve a balance between, and integration of, ecological, economic, and social factors into a comprehensive strategy aimed at protecting and enhancing sustainability, diversity, and productivity of the Huron-Manistee National Forests' natural resources. One of the tools used to meet these values is timber harvest. Potential impacts are analyzed and disclosed in the Final Environmental Impact Statement, Chapter III, pages III-215 through 221. The Forests also recognized the need for ecosystem restoration and landscape-level management of resources to promote species viability and to enhance ecosystem function, particularly in ecosystems frequently disturbed by fire. The Selected Alternative attempts to ensure the distribution, abundance, and habitat requirements for species adapted to mature forest and for those requiring large opening complexes.

PC#: 121
Public Concern: The Huron-Manistee National Forests should work with the road commission to remove diseased trees before blocking roads in the Forests.

Response: Removal of hazardous trees is an administrative, public safety activity, which is handled on a site-specific basis and is outside the scope of Forest Plan revision.

PC#: 122
Public Concern: The Final Environmental Impact Statement should disclose the amount carbon that is being stored on the Forests and how the actions proposed in the revised Forest Plan will release stored carbon. Forest management activities such as logging, road building, and burning result in significant carbon release to the environment. Increases in CO2 in the atmosphere are contributing to global climate change, which could have a serious effect on our forests.

Response: There exists an abundance of recent scientific discourse on the interplay of forests, climate change, and carbon sequestration. The Forests believe the level of uncertainty about possible climate change effects on Michigan forests, or the overall role of our forests in influencing climate change, via carbon sequestration, is still too great to provide a firm foundation for proposing broad-scale changes to vegetation or forest practices. That is the reason more thorough analysis of climate change, or specific Forest Plan direction to address climate change, was not developed in our Forest Plan revision process. As science advances to a level of greater clarity about the interrelationships between Michigan forests and climate change, development of measures to intercede, and numerous legal provisions for plan amendments and revisions, will ultimately provide the means for making responsive changes to Forest Plan direction. We believe the rates of change are likely to be slow enough that our ability, if any, to exert influence will not be significantly compromised by the direction of management the Forests' Plans establish for the next 10-15 years. We also are hopeful that Forest Plan direction for moving toward increased diversity in amounts, conditions, and patterns of vegetation will result in forests that are more resilient to potential climate change.

Forest Transportation System - General:

PC#: 123
Public Concern: The Final Environmental Impact Statement should disclose the process and criteria used in transportation planning for the Forests.

Response: During the Analysis of the Current Management Situation that was conducted in 2003, the Huron-Manistee National Forests determined that issues related to access were adequately addressed in the 1986 Forest Plan. The Forests' Analysis of the Current Management Situation identified that there were no critical or compelling reasons to change the direction or strategy for access contained in the 1986 Forest Plan based on public comment and Forests staff analysis. The Forests determined that unless substantive new information was revealed, the Forest Plan revision process would not include access issues. A forest-wide roads analysis for maintenance levels 3 through 5 was conducted in 2002. Maintenance level 1 and 2 roads as well as user-developed roads are evaluated during analysis of a site-specific project. The revised Forest Plan sets road densities and states that when a road is not needed for administrative use or

public needs that the road should be closed. The process used to determine whether roads are no longer needed for administration or public use requires a site-specific National Environmental Policy Act analysis, including public involvement.

PC#: 124
Public Concern: The revised Forest Plan should discuss and address level 2 roads in Management Area 2.1, page III-2.1-8, Section 7700, and Management Area 8.4, page III-8.4-4, Section 7700, as these roads should remain open, as are county level 2 roads. Signing should be similar to county signs, maintaining uniformity.

Response: The direction provided in Management Area 2.1, Section 7700, refers specifically to roads providing access to oil and gas extraction. The Huron-Manistee National Forests do not have jurisdiction over county roads and counties do not use the Forest Service road classification system. Posted county seasonal roads are collector roads. A Forest Service classified level 2 road is defined as a road that is open for a limited amount of traffic usually consisting of administrative, permitted or dispersed recreational, or other specialized use (Final Environmental Impact Statement, Appendix J, page J-38). The Huron-Manistee National Forests do not propose to close county roads. Forest Service roads are evaluated on a site-specific basis to determine whether they are needed for administrative or public use.

The standard and guide cited in the 7700 section of III-8.4-4 refers specifically to roads developed for oil and gas production in the Special Areas. The signing of Forest Service roads is in accordance with Forest Service Handbook direction.

PC#: 125
Public Concern: The revised Forest Plan, page II-40, Table II-15 should be clarified. Define Local, Collector, and Arterial roads as to ownership and list their level.

Response: These types of roads may include all ownerships, and maintenance levels may vary according to the individual road. Definitions of local, collector, and arterial roads are in the revised Forest Plan, Appendix J, Glossary, page J-38.

Fragmentation:

PC#: 126
Public Concern: The Huron-Manistee National Forests should monitor the degree and intensity of fragmentation occurring on National Forest System lands.

Response: The Huron-Manistee National Forests recognizes fragmentation as a critical issue. Fragmentation has been identified by the Chief of the Forest Service as one of the four most important threats facing National Forest System lands today. Chapter IV, Monitoring and Evaluation, provides the monitoring framework for the revised Forest Plan. This framework is intentionally general with respect to specific species, environmental parameters, and monitoring methodology. This provides the Forests flexibility to adapt to changes, such as new scientific information or emerging issues. The Monitoring Matrix in Chapter IV does provide that: 1) the Forests will monitor the amounts, distribution, and types of available habitats to ensure the

sustainability of terrestrial and aquatic ecosystem at multiple scales; and 2) the Forests will monitor to ensure that the minimum viable populations of appropriate native and desirable non-native species will be maintained within the planning area. Other monitoring requirements provided in Chapter IV, such as monitoring vegetation management and successional stage within the Streamside Management Zone also apply.

The revised Forest Plan attempts to limit habitat fragmentation through an increase in large-block management, increased attention to landscape-level habitat connectivity, and Standards and Guidelines that reflect our understanding of the habitat requirements of the species found on the Forests. The Huron-Manistee National Forests provide direction for the restoration, maintenance, and enhancement of wildlife habitat through Forestwide and Management Area specific Goals, Objectives, Standards, and Guidelines found in the revised Forest Plan, including direction for Endangered, Threatened, and Sensitive Species, as well as Regional Forester's Sensitive Species. The management of the Huron-Manistee National Forests provides for the use of renewable forest resources in a combination that best meets the needs of the American people. The revised Forest Plan strives to achieve a balance in the protection of habitat for birds, fish, and other wildlife.

Fuel Barriers:

PC#: 127
Public Concern: The Final Environmental Impact Statement should disclose the methodology used in determining the amount of fuel barrier and hazardous fuels risk reduction acres scheduled for creation and maintenance.

Response: The Forests used a geographic information systems analysis to determine the required acreage. A 300-foot buffer width was assumed a safe zone around National Forest System lands adjacent to private property. Current research has indicated through fire behavior simulation that Fuel Model 4 (Anderson 1982), which jack pine is modeled as, will ignite structures within 380 feet when adjacent to this shrub model (Scott 2003). This buffer width is a minimal value for areas adjacent to jack pine, however structures adjacent to red pine type could require a larger buffer when the intent of that buffer is to provide defensible space adjacent to private land in which firefighters can defend structures and law enforcement can evacuate people affected by the fire.

With regard to the methodology used in determining the hazardous fuels on the forest and the reduction acres, a landscape geographic information systems spatial analysis was performed. This analysis included the incorporation of the landtype association, soil type and hydrology, historical fire location and frequency, the vegetation type and its structure, and associated fire-intensity coefficient, which was based on observed fire behavior for a particular vegetation type during the spring upland-conifer candling period. These characteristics were integrated to produce a spatial assessment, which identified areas that would have a high probability of an extreme-intensity crown fire, a high-intensity surface to crown fire, a moderate-intensity surface fire, and a low-intensity surface fire. After delineating the areas identified as those having a high probability of an extreme-intensity crown-dominated wildfire, red and jack pine stands were identified within these areas. The 300-foot buffer of the National Forest System lands was then

overlayed adjacent to private property to define those areas, which would need to be treated to provide a minimum buffer either in order to evacuate local people or to defend structures which are defensible.

Game Species – White-tailed Deer:

PC#: 128
Public Concern: The Huron-Manistee National Forests should ask the Michigan Department of Natural Resources to issue more deer hunting licenses resulting in more deer harvested so that tree species will not be so readily browsed.

Response: The Michigan Department of Natural Resources is cognizant of the correlation between deer numbers and vegetation damage. The State of Michigan hunting laws and regulations are outside of Forest Service jurisdiction.

Game Species – Ruffed and Sharp-tailed Grouse:

PC#: 129
Public Concern: The revised Forest Plan should increase habitat for woodcock and grouse through aspen and birch management and management in riparian areas for early successional species.

Response: Management of aspen, openings, shrub/scrub, and riparian areas under the Selected Alternative will provide habitat for woodcock and grouse. This management will maintain the viability of the species dependent on these habitat types on the Huron-Manistee National Forests.

PC#: 130
Public Concern: The Huron-Manistee National Forests should recognize Sharp-tailed grouse as a desirable non-native species.

Response: Although sharp-tailed grouse are extremely rare and uncommon, the Huron-Manistee National Forests do consider sharp-tailed as a desirable species. As such, during Forest Plan revision viability of the species was analyzed. Management activities in the Selected Alternative, such as jack pine harvest and restoration and creation of pine barrens, dry sand prairies, and large mesic grassland habitats, are expected to improve the species' viability (Final Environmental Impact Statement, Appendix B, Table B-3, page B-14).

PC#: 131
Public Concern: The Huron-Manistee National Forests should cooperate with the Michigan Department of Natural Resources to transfer sharp-tailed grouse from the Upper Peninsula to a promising site on the Forests to increase the population and improve the gene pool.

Response: The revised Forest Plan (pages II-4 to II-6) does not preclude the reintroduction of native or desired non-native species. Site-specific reintroduction projects are outside the scope of this document.

Heritage Resources:

PC#: 132
Public Concern: The revised Forest Plan should recognize and address the old Cadillac to Traverse City Indian Tail. Management direction with appropriate Standards and Guidelines need to be restored in the Forests' Plan.

Response: The Cadillac to Traverse City Indian trail is an important interpretive resource for the Manistee National Forest. Public interest in the trail has been high. According to our file of various maps, articles, brochures and Government Land Office plats, three to four miles of the trail probably crossed current National Forest System Lands in about four separate locations. The trail corridor(s) is identified in our heritage property files and will be recognized as important and sensitive during project planning. Protection measures will be considered, coordinated, and implemented following appropriate established laws, regulations, and policies for the protection of cultural resources.

As stated in Chapter I of the revised Forest Plan, one of the basic principals of management the Huron-Manistee National Forests will adhere to is that the Forest Service will follow laws and regulations as well as policies in Forest Service Manuals and Handbooks that relate to managing National Forest System lands. The Huron-Manistee National Forests believe that current laws, regulations, and policies provide sufficient management direction to provide the protection that this important and significant cultural resource requires, such as the 1966 National Historic Preservation Act, as amended in 1980, 1992, and 1979, and the Archaeological Resources Protection Act, as amended 1988. Because the revised Forest Plan is designed to supplement, not replace, direction from these sources, and because sufficient management direction already occurs in law, regulation, and policy, the Huron-Manistee National Forests have decided that specific Standards and Guidelines for the Cadillac to Traverse City Indian trail are unnecessary.

Land Exchanges:

PC#: 133
Public Concern: The Huron-Manistee National Forests should maintain or increase current acreage on National Forest and not dispose of acreage.

Public Concern: The Huron-Manistee National Forests should not allow for a net increase in Federal ownership. The transfer of private lands to public lands continues to erode the tax base for local government. To increase that acreage when significant shortfalls in implementation targets already occur does not make sense.

Response: Acquiring or disposing of land is done only after a determination is made that the public interest will be well served. When considering the public interest, full consideration is given to the achievement of better management of Federal lands and resources, to meet the needs of State and local residents and their economies, and to secure important objectives. Objectives include, but are not limited to: 1) protection of fish and wildlife habitats, cultural resources, watersheds, wilderness and aesthetic values; 2) enhancement of recreation opportunities and

public access; 3) consolidation of lands and/or interests in lands, such as mineral and timber interests; 4) expansion of communities; 5) accommodation of existing or planned land use authorizations; 6) promotion of multiple use values; 7) implementation of applicable Forest revised Forest Plans; and 8) fulfillment of public needs. Our intent is that any future land acquisitions on the Forests will be done by working with willing sellers or exchange proponents, and will be guided by forestwide or Management Area-specific direction for land acquisition in the revised Forest Plan. Consideration of potential effects on the social and economic fabric of nearby local communities is a necessary and required facet of determining if any given, future land adjustment action is clearly in the "public interest."

During the early phases of Forest Plan revision, Analysis of the Current Management Situation and public involvement associated with the Need For Change and Notice of Intent, it was determined that the original 1986 Forest Plan provided sufficient direction to appropriately manage issues related to acquisition and disposition of Forest Lands. The Forests have no proposal to reduce ownership but may acquire or exchange lands as provided for in the revised Forest Plan. Individual land exchanges are evaluated on a site-specific basis through separate environmental analysis.

Land Suitability:

PC#: 134
Public Concern: The Huron-Manistee National Forests should explain the difference between a higher land suitable for timber production acreage figure in a study done on December 17, 2003 and that disclosed in the Final Environmental Impact Statement, Appendix H, page H-3. Allowable sale quantity volumes should be based on what the regional timber demand is and what the forest is actually capable of producing with all physical, congressional, or Forest Service mandated constraints subtracted, for example, old growth.

Response: Table H-1, found on Page H-3 of the Final Environmental Impact Statement, refers to the Total Forest Land Suitable for Timber Production, or 401,121 acres. Land suitable for timber production is calculated by taking the Huron-Manistee National Forests land total and subtracting land: 1) withdrawn from timber production, 2) not producing crops of industrial wood, 3) not physically suited, and 4) for which information is inadequate.

The document dated December 17, 2003, as referenced, deals with a suitability evaluation that was part of the Analysis of the Current Management Situation on the Forests. *SUITED LANDS* in the evaluation are National Forest System lands that are biologically and physically capable of producing timber. Suited Lands, (Land Suitability Class 500, were determined to be 687,901 acres.

The determinations Total Forest Land Suitable for Timber Production, and Suited lands, Land Suitability Class 500 are not directly comparable.

Management Areas – General:

PC#: 135
Public Concern: The revised Forest Plan should be composed of an alternative approach regarding designation of semiprimitive motorized Areas and semiprimitive nonmotorized Areas. The Huron-Manistee National Forests should continue the progression of more restricted Management Area designation to unrestricted, as in Rural Natural to Rural because there is no demonstrated need for Management Areas that serve a small minority of forest users.

Response: The Huron-Manistee National Forests are managed in accordance with the Multiple-Use Sustained-Yield Act of 1960. The Forests have been divided into Management Areas, each providing a different mix of opportunities and outputs. One of the recreation opportunities requested and provided for in these Management Areas is a motorized experience. As part of the current Forest Plan revision process, the Forests reviewed all Management Area designations based on regional and national guidelines. Recommendations were made to change Management Area designations. These recommendations are reflected in the three alternatives and the potential impacts are disclosed in the Final Environmental Impact Statement, pages III-299 through 307. The Forests retain nonmotorized recreation opportunities in all Alternatives. The Final Environmental Impact Statement analyzed a variety of Alternatives with different outcomes, including semiprimitive areas, to address Plan Revision issues (Final Environmental Impact Statement, Chapter II, page II-3). Because the alternatives considered did not respond to the Forest Plan revision issues or maintain species viability, they were eliminated from further consideration.

PC#: 136
Public Concern: The Final Environmental Impact Statement should disclose the reason for changing Management Areas 1.1, 3.1 and 4.1 semiprimitive motorized to 6.2 semiprimitive motorized and if 6.2 designation Standards and Guidelines are more restrictive than the former designations.

Response: Management Areas 1.1, 3.1, and 4.1 were combined to reduce redundancy and facilitate the understanding of management of semiprimitive motorized Areas. The Standards and Guidelines for Management Area 6.2 were obtained from Standard and Guidelines in Management Areas for 1.1, 3.1, and 4.1 in the 1986 Forest Plan and are, therefore, as restrictive as the previous Management Areas.

PC#: 137
Public Concern: The Final Environmental Impact Statement should disclose if Management Area 7.1 and 8.3, Experimental Forests, are being used for their intended purpose; they should be put into a Management Area where they can be managed, if not.

Response: The general provisions of the Organic Administration Act of 1897 (16 USC 551) and the Forest and Rangeland Renewable Resource Research Act of 1978 (16 USC643) authorize the Secretary of Agriculture to designate experimental forests and ranges. Under regulations at 7 CFR 2.60(a), the Secretary of Agriculture has delegated this authority to the Chief of the Forest

Service. Forest Service regulations at 36 CFR 251.23 set forth broad direction for establishing and administering these areas.

The authority for the Forest Service to establish research natural areas is summarized as follows: 36 CFR 251.23 Experimental areas and Research Natural Areas: "The Chief of the Forest Service shall establish and permanently record a series of areas on National Forest land to be known as experimental forests or experimental ranges, sufficient in number and size to provide adequately for the research necessary to serve as a basis for the management of forest and range land in each forest region."

Management direction for experimental forests is established by the North Central Research Station, St. Paul, MN. The Huron-Manistee National Forests do not have the authority to dissolve the experimental forests. Therefore, the Udell Experimental Forest will remain as Management Area 8.3. The Udell Experimental Forest was originally established for long-term watershed management research.

PC#: 138
Public Concern: The revised Forest Plan should consider maintaining Management Area 8.4 Management Area level 2 roads as they are rather than maintaining them at level 3 standards.

Response: The Proposed Forest Plan contained a Standard and Guide in the 7700 section of III-8.4-4 and referred specifically to roads developed for oil and gas production in the Special Areas. Despite the fact that the Standard and Guideline did not require all roads in 8.4 Management Areas to be maintained at level 3 or higher, section 2800 Minerals and Geology, states that federal oil and gas leases will contain a no-surface occupancy stipulation. Since there is no need for level 3 roads for oil and gas purposes, the 7700 section was deleted from the revised Forest Plan

Management Indicator Species:

PC#: 139
Public Concern: The Final Environmental Impact Statement should disclose whether the target of 40 brook trout per acre will allow the Forests to meet its objective for maintaining viable populations of existing native and desired non-native species.

PC#: 140
Public Concern: The Final Environmental Impact Statement should disclose how the target of one brook trout per 100 square meters was determined and how this guideline is related to the management indicator species brook trout guideline.

PC#: 141
Public Concern: The Huron-Manistee National Forests maintenance target for brook trout populations should be 100 percent rather than 25 percent of the state level.

Response: The guideline of one brook trout per 100 square meters (revised Forest Plan Chapter II, 2600, VIII Fish, Guideline A,1, a) was replaced with the proposed management indicator

species guideline of 40 individuals/acre, in the Final Environmental Impact Statement, Appendix G.

The level of 40 individuals per acre was determined to be a reasonable estimate of a minimum viable population level even though it is only 25 percent of a documented average population level for 13 northern Michigan streams for the following reasons:

- Biologists define *minimum viable population size*, as the critical population size, below which the population has a very small chance to survive (Sznajd-Weron 2000). The average population level is not used to determine the minimum viable population size because any long-term average is mathematically based on a range of data. In the case of the northern Michigan data (Gowing and Alexander 1980), the range used to calculate the average population for brook trout was as low as 25 percent of this average number of individuals. Even going that low, these populations of trout in the 13 streams are still surviving. Thus, it was determined that, based on the best information available, this would be an acceptable minimum viable population size to use as a guide.

Setting the minimum viable population size at 25 percent of the average level is further corroborated by examination of long-term data on the South Branch Au Sable and Au Sable Rivers, two streams closed to angler harvest Michigan Department of Natural Resources Hunt Creek Research Station website. Brook trout population levels varied by as much as an order of magnitude due to natural variation alone over a 10-year period, for example, 67 – 768 individuals/acre. While the lower number from this data set is 67 percent higher than the proposed minimum viable population size of 40 individuals per acre in the revised Forest Plan, these two river segments are more productive than the headwater areas that typically make up the bulk of the stream habitat on the Huron-Manistee National Forests.

PC#: 142
Public Concern: The selection of Management Indicator Species determines management direction or emphasis on the Huron-Manistee National Forests. The Management Indicator Species chosen by the Huron-Manistee National Forests provide a distorted view of how the Forests will be managed.

Response: Management indicator species are not intended to provide an indication, or view, of how the Forests will be managed nor do they drive management direction on the Forests. Rather, decisions regarding management direction were made through the Forest Plan revision process according to law, regulation, and policy and social, economic, and ecological considerations. Management indicator species are then selected in specific instances to monitor the effectiveness of implementation of the management direction.

PC#: 143
Public Concern: The Huron-Manistee National Forests have not selected enough Management Indicator Species to represent an appropriate variety of habitat types or to assess the effects of management activities on ecosystems (management indicator species). Particularly lacking are

old-growth dependent species (especially bald eagle and pileated woodpecker) and species vulnerable to local extinction due to fragmentation (especially carnivores).

Response: The Rules and Regulations pertaining to Management Indicator Species (36 CFR 219.19) do not require the Forest Service to select a particular number of management indicator species nor do they require the Forest Service to select management indicator species for each habitat or vegetative community on the Forests. Rather, the regulations require that the Forests identify and select "*certain vertebrate and/or invertebrate species present in the* [Forest Planning] *area*" as management indicator species and state the reasons for the selection of those species. Rational for selection of management indicator species in the Regulations (also 36 CFR 219.19) go on to say that species are to be selected "*…because their population changes are believed to indicate the effects of management activities."*

Peer-reviewed published research has concluded that using management indicator species to evaluate the effectiveness of management activities has limitations, for example, Nemie 1997. Therefore, the Forests have focused emphasis on monitoring a few key management indicator species while supplementing this effort with other monitoring, such as tracking the quality and quantity of key habitats. For example, the Forests believe that monitoring certain habitats or habitat conditions, such as mature or old-growth forest or fragmentation, is better accomplished by directly measuring the abundance and quality of such habitats, such as patch size, structure, or degree of fragmentation compared to doing it indirectly through species population monitoring.

Supplemental monitoring efforts are summarized in Chapter IV: Monitoring and Evaluation of the revised Forest Plan. In this chapter, the Forests describe the overall monitoring framework that will be used to evaluate the environmental, as well as social and economic, impacts of implementing the revised Forest Plan. The Monitoring Matrix in Chapter IV provides that: 1) the Forests will monitor the amounts, distribution, and types of available habitats to ensure the sustainability of terrestrial and aquatic ecosystems at multiple scales; and 2) the Forests will monitor to ensure that the minimum viable populations of appropriate native and desirable non-native species will be maintained within the planning area.

The Forests originally selected five Management Indicator Species: Karner blue butterfly, Kirtland's warbler, ruffed grouse, brook trout, and mottled sculpin. Since the Draft Environmental Impact Statement was published, the Forests added the bald eagle as a Management Indicator Species.

The selection of all of these species is consistent with rules and regulations pertaining to management indicator species selection (CFR 36 219.19). Specific rationale for the selection of the six management indicator species identified in the revised Forest Plan is given in Appendix G of the Environmental Impact Statement. In summary, the Forests evaluated potential management indicator species against four criteria: 1) habitat and population information was known and complete regarding habitat use, threats, and limiting factors; 2) sampling protocols were in place sufficient to develop population estimates and trend information and past and current data for the Forests exists; 3) there is a well-documented cause and effect relationship between management actions and changes in population on the Forests; 4) the species played an important ecological role or changes in its population were known to represent changes in other

species with similar habitat requirements. After being subjected to this screening process, many species, formerly considered acceptable management indicator species by the Huron-Manistee National Forests, were determined to be unsuitable (see Appendix G of the Final Environmental Impact Statement).

The pileated woodpecker was not selected as a management indicator species because it failed Criterion 2: sampling protocols are not in place sufficient to develop population estimates for the species and trend information for the Forests does not exist (See Appendix G, Final Environmental Impact Statement).

PC#: 144
Public Concern: The Huron-Manistee National Forests have chosen inappropriate species as Management Indicator Species.

PC#: 145
Public Concern:
Threatened and endangered species such as Kirtland's Warbler and Karner blue butterfly are inappropriate because too many variables that are beyond the control of the Forest Service influence their populations.

PC#: 146
Public Concern:
Ruffed grouse should not be a Management Indicator Species.

PC#: 147
Public Concern:
Management Indicator Species that use similar habitats, such as the brook trout and mottled sculpin, should be avoided.

Response: The Rules and Regulations pertaining to Management Indicator Species (36 CFR 219.19) require that management indicator species are to be selected "*…because their population changes are believed to indicate the effects of management activities.*" The rules further state that, "*In the selection of management indicator species, the following categories shall be represented where appropriate: Endangered and Threatened plant and animal species identified on State and Federal lists for the planning area; species with special habitat needs that may be influenced significantly by planned management programs; species commonly hunted, fished, or trapped; non-game species of special interest; and additional plant or animal species selected because their population changes are believed to indicate the effects of management activities on other species of selected major biological communities or on water quality.*" The Kirtland's warbler and Karner blue butterfly are both federally endangered species and the ruffed grouse is a species that is commonly hunted. All three species have special habitat needs that are influenced significantly by planned management programs. Therefore, all three species, in accordance with rules and regulations, are appropriate management indicator species.

During Forest Plan revision, all species considered potential management indicator species were subjected to a "screening" process whereby they were subjected to four evaluation criteria: 1)

habitat and population information was known and complete regarding habitat use, threats, and limiting factors; 2) sampling protocols were in place sufficient to develop population estimates and trend information, and past and current data for the Forests exist; 3) there is a well documented cause and effect relationship between management actions and changes in populations on the Forests; 4) the species played an important ecological role, or changes in its population were known to represent changes in other species with similar habitat requirements (Appendix G Final Environmental Impact Statement). All four criteria applied to the Kirtland's warbler, Karner blue butterfly, and ruffed grouse. As such, the species were selected as management indicator species. Since the Draft Environmental Impact Statement was published, the Forests added the bald eagle as a Management Indicator Species.

The Forests acknowledge that the populations of all species are subjected to variables that are beyond the control of the Forest Service. However, the Huron-Manistee National Forests provide approximately one half of all known summer breeding range for the Kirtland's warbler and its population numbers are demonstrably tied to management activities on the Forests (Huber et al. 1999). Similarly, in the Karner blue Butterfly Recovery Plan, the Fish and Wildlife Service (2003) identify lands within the Huron-Manistee National Forests as critical for the recovery of that species. Thus, population levels of that species will also be significantly influenced by planned management programs. Lastly, the ruffed grouse was selected as a management indicator species because it is an indicator of disturbances in the aspen/birch community type; is a species that is central to considerable social, ecological, and economic values; and its populations indicate the effectiveness of a large proportion of future vegetation management activities on the Forests. It has been the experience on the Forests that monitoring programs for Kirtland's Warbler, Karner blue butterfly, and ruffed grouse, in partnership with other agencies, have proven particularly useful for evaluating the efficacy of our management and the Forests are confident that they are appropriate and justifiable management indicator species.

Although the brook trout and mottled sculpin do represent similar habitat conditions, it was determined that having two species for this habitat type was useful because: 1) brook trout are subjected to fishing pressure and angler harvest could introduce bias into population estimates being used to monitor the revised Forest Plan implementation, making it difficult to determine whether population changes are due to changes in habitat or angler harvest; and 2) the mottled sculpin is not subjected to fishing pressure and associated angler harvest, thus its population trends may therefore be more easily tied to management without this additional bias being introduced.

[1]Huber, P.W., J A. Weinrich, E.S. Carlson. 1999. Strategy for Kirtland's Warbler Habitat Management. Forest Service and Michigan Department of Natural Resources Report.

Minerals

PC#: 148
Public Concern: The Huron-Manistee National Forests should include a discussion of potential impacts to water quality and quantity that may occur because of the Forest Plan's allowing mineral exploration and mining in the Final Environmental Impact Statement. The Draft

Environmental Impact Statement does not include a discussion of the cumulative impacts to water quantity of Alternative B (the Selected Alternative) and C.

Response: Chapter III, Effects on Water Resources, Final Environmental Impact Statement was updated to identify cumulative effects to water quality and quantity.

PC#: 149
Public Concern: The Huron-Manistee National Forests should not permit air pollution in the form of toxic or sour gasses from oil and gas extraction to occur eight months of the year in endangered species habitat. The standard and guideline, which reads, "Any well emitting toxic or sour gases into the air within one-half mile of occupiable habitat may not be operated during May 1 to September 30" should be changed. Wells emitting toxic or sour gas should be shut down until repaired.

Response: The standard cited was written prior to the 1996 revision of the Michigan Department of Environmental Quality's Oil and Gas regulations. The current Department of Environmental Quality regulations do not allow emissions of hydrogen sulfide gas to the atmosphere. The regulations require that sour gas must be burned or injected into an approved underground formation. Based on these updated regulations, we have revised the standard in the revised Forest Plan, Chapter II, page II-36, to read: "Producing wells shall not emit hydrogen sulfide gas to the atmosphere. Sour gas must be burned, incinerated, or injected into an approved underground formation in accordance with Michigan's Oil and Gas Regulations." (R324.1129, effective Sept. 20, 1996). This new standard will apply to all management areas.

PC#: 150
Public Concern: The Huron-Manistee National Forests should not allow surface occupancy for oil and gas development in sensitive areas such as semiprimitive nonmotorized areas or endangered species habitat for the Kirtland's warbler.

Response: The federal government has a number of policies, regulations, and laws to encourage the development of mineral resources. The Mining and Mineral Policy Act of 1970 states that agencies shall "Foster and encourage private enterprise in the development of economically sound and stable industries, and in the orderly and economic development of domestic resources to help assure satisfaction of industrial, security, and environmental needs." The Forest Service's mission as it relates to minerals management is to "encourage, facilitate, and administer the orderly exploration, development, and production of mineral and energy resources on National Forest System lands to help meet the present and future needs of the Nation." (Forest Service Manual 2800, Zero Code)

A 1996 environmental analysis and decision amended the Huron-Manistee National Forests revised Forest Plan to address surface use for oil and gas exploration/development and leasing availability for lands in semiprimitive nonmotorized areas (Forest Plan Amendment #23, 2001). The amendment specified a maximum surface development density of one surface location for every 640 acres in Management Area 6.1 (Proposed Forest Plan, page II-36). The revised Forest Plan identifies most lands included in Management Areas 8.1, 8.2, 8.3, 8.4, 9.1, and 9.2 as "no surface occupancy" for oil and gas development (revised Forest Plan, Chapter 3, 2800 direction).

These surface use restrictions for Wild and Scenic River corridors, Research Natural Areas, experimental forests, and "special areas," together with the other Standards and Guidelines in the revised Forest Plan (pages II-14 through 15, II-19, II-27, II-35 through 37, II-39, II-40), are designed to limit the density of oil and gas development and mitigate effects while still meeting the agency's responsibilities under the various laws, regulations, and policies encouraging the development of mineral resources. The Final Environmental Impact Statement included an analysis of the reasonably foreseeable development across the Forest for the next 10 to15 years. The findings documented in the effects analysis do not support the need for additional restrictions relating to oil and gas development. Lease stipulations or restrictions must be reasonable and necessary. The existing Standards and Guidelines regarding surface use addressed in the Management Areas listed above are carried forward in the revised Forest Plan.

The Standards and Guidelines for oil and gas operations outlined for Management Area 4.2 are designed to protect Kirtland's warbler habitat. These restrictions were developed through Forest Plan Amendment #23 and its associated analysis to ensure that management activities maintain essential nesting habitat for Kirtland's warbler in compliance with the provisions of Section 7 of the Endangered Species Act and as outlined in the Kirtland's Warbler Management and Recovery Plan. These restrictions include seasonal drilling, surface location density restrictions depending upon the age of the trees, for example, 1 location per 640 acres or 1 location per 160 acres, reforestation, and additional mitigation based on site-specific review (Forest Plan Amendment #23, 2001, revised Forest Plan, pages III-4.2-11 through 4.2-13). The analysis of impacts included in the Final Environmental Impact Statement for the revised Forest Plan does not reflect a need to increase restrictions on oil and gas development in Management Area 4.2. This is further confirmed through the Fish and Wildlife Service's concurrence with the findings outlined in the Biological Evaluation prepared for the revised Forest Plan. Considering these analyses, and the agency's responsibilities under the various laws, regulations, and policies encouraging the development of mineral resources, the Standards and Guidelines developed under Amendment #23 are carried forward in the revised Forest Plan.

At the time specific lands are identified for leasing, a site-specific review of these lands will be conducted and appropriate restrictions for occupancy will be identified based on the combination of the Standards and Guidelines and the site-specific review. If "sensitive areas" are identified during the review, additional analysis may be conducted if necessary to identify additional lease stipulations prior to making those lands available for leasing. As stated above, occupancy restrictions are identified for semiprimitive nonmotorized areas and special areas in the revised Forest Plan.

The approval of a specific proposal, including the surface use plan for an individual well, would be done following a site-specific analysis of the specific proposal(s), including proposed flowlines, roads, etc. The operator must complete and obtain approval of their Surface Use Plan of Operations and Drilling Permit from the Forest Service and the Bureau of Land Management, respectively.

PC#: 151
Public Concern: When mineral leases are put up for sale, they should designate in advance those areas where surface disturbance will not be allowed. These designations should pay

particular attention to both the ecological needs and the recreation experience of the affected surface area.

Response: The Forest Service does designate, in advance of leasing, what areas are open and closed to surface occupancy for oil and gas development, and if open, under what conditions. The revised Forest Plan's Standards and Guidelines identify the condition under which occupancy would be considered at a Forest-wide scale. At the time specific lands are nominated for lease, a site-specific review of these lands is conducted and appropriate restrictions for occupancy identified based on the combination of the Standards and Guidelines and site-specific review. If specific concerns relating to ecological or recreational values are identified during this review, additional analysis may be conducted if deemed necessary to identity additional lease stipulations prior to making those lands available.

Should leasing of specific lands occur, a more site-specific analysis of individual drilling proposals, including proposed flow lines, roads etc., must be completed and the operator must obtain approval of their Surface Use Plan of Operations and Drilling Permit from the Forest Service and the Bureau of Land Management, respectively.

PC#: 152
Public Concern: Referring back to Appendix E, the Forest Service again fails to consider the cumulative effect of all of those potential gas and oil wells…Consider cumulative effect of all exploration, drilling and production…While we appreciate that the author of Appendix E was making projections, projecting cumulative effect would not be unreasonable under the circumstances.

Response: Appendix E provides a projection of the reasonably foreseeable development for oil and gas across the Huron-Manistee National Forests for the next 10 to15 years. This projection is required by regulation and is not meant to be an effects analysis. The direct, indirect, and cumulative effects analysis related to the foreseeable development projected in Appendix E is included in Chapter III of the Final Environmental Impact Statement. This analysis considers mitigation provided by the revised Forest Plan Standards and Guidelines, Chapter II and III. In addition to the Standards and Guidelines many of the potential effects are mitigated, and thus not identified as a potential effect, through existing regulation such as the casing/cementing requirements for oil and gas wells for protection of groundwater resources (Bureau of Land Management, Onshore Order #2).

PC#: 153
Public Concern: The Huron-Manistee National Forests should have required greater setback distances for oil and gas extraction surface occupancy from lakes, rivers and the River Road National Forest Scenic Byway. The setback distances in the Forest Plan are inadequate to protect resources.

Response: With respect to lakes and rivers, the 300-foot setback outlined in the revised Forest Plan is considered to be a minimum setback (revised Forest Plan, Page II-19, 3, a or b). This guideline will be attached to a Federal oil and gas lease as a lease stipulation, which will dictate how, when and where an oil and gas lessee may locate a proposed well (Forest Plan, Page II-35,

B, 1). In addition, use of Best Management Practices during surface disturbing activities will further lessen potential impacts to adjacent open water.

Although the Forests do not have a setback identified, the Forest Service has imposed a "no surface occupancy" restriction for wetland areas.

The 300-foot "no surface occupancy" buffer for oil and gas activity along the River Road National Scenic Byway is considered adequate for protection of visual and aesthetic values along the road. Page III-295 of the Final Environmental Impact Statement states that Standards and Guidelines are incorporated into the revised Forest Plan, which addresses visual impacts of forest management activities, including "minerals and oil and gas." The following expectations apply to those activities: "the Scenic Integrity Objectives associated with a management area would be known and incorporated in any management decision; any constructed facilities would blend into the landscape; visual expectations of management within areas of disturbance would be identified and implemented in a timely manner, site-specific projects would minimize visual impacts as prescribed by Scenic Integrity Objectives and Standards and Guidelines." If a lease is issued for minerals located in the corridor of the Scenic Byway, and if oil and gas exploration/development should be proposed, a site-specific environmental analysis would be conducted prior to permitting surface disturbance. This analysis would consider protection of the visual and aesthetic qualities of the Byway in accordance with the Scenery Integrity Objectives. In addition, site-specific reclamation may include introduction of vegetative screening, if necessary.

Oil and gas development on federal leases are subject to lease stipulations, which allow reasonable movement of a proposed well location, and site-specific mitigation if justified (43 CFR 3101.1-2). If it is determined that a proposed well location is too close to a river, wetland, or the scenic byway, the agencies can move the proposed location up to 200 meters. This additional 200 meters (656 feet) gives the agencies the flexibility to move the location beyond the established "no surface occupancy" buffer if deemed necessary. In addition, upon receipt of a proposed well location a site-specific environmental analysis would be completed.

Based on the above information, the ability to move a surface occupancy site, and the need to site-specifically analyze and mitigate effects prior to surface disturbance, the no surface occupancy setbacks are deemed sufficient. The commenter did not provide any additional information, which would justify the need to increase this, proposed no surface occupancy buffer.

Monitoring:

PC#: 154
Public Concern: The Forest Plan should identify inventory and use pattern information needs and set objectives for meeting those needs. The plan should also provide adequate monitoring requirements to ensure that it will not result in damage to the forest. This should include requirements for in-the-field monitoring of an adequate range of forest species. These requirements should be mandatory and frequent.

Response: Forest Service Manuals and Handbooks give direction on inventory intervals and protocols to use when collecting data on National Forest System lands. Annually, each Forest must decide what is actually going to be collected based on a priority of need and budget constraints.

The Huron-Manistee National Forests describe, in Chapter IV: Monitoring and Evaluation of the revised Forest Plan, the monitoring framework that will be used to evaluate the environmental, as well as social and economic, impacts of implementing the revised Forest Plan. The framework is general with respect to specific species, environmental parameters, or methods, and thus, provides flexibility to adapt to changes, such as new scientific information or emerging issues. The monitoring framework is consistent with requirements set forth in the National Forest Management Act regulations. Specific information concerning the "what" and "how" monitoring will be carried out will be included in the "Monitoring and Evaluation Implementation Guide." The implementation guide will also identify data gaps and collection needs that will be necessary to monitor the implementation of the revised Forest Plan, and to evaluate the effectiveness of management practices and compliance with laws, rules, and regulations.

The Forests believe that the monitoring framework outlined in Chapter IV will provide the information needed to ensure that implementation of the revised Forest Plan will not result in damage to the forest.

Motorized Recreation:

PC#: 155
Public Concern: The revised Forest Plan should include a plan to limit or close access to at-risk or sensitive lakes and rivers to personal watercraft to minimize shoreline erosion, protect wildlife habitat, and limit noise.

Response: The authority to limit or close access to personal watercraft lies with the State of Michigan as delegated to the local township unit of government. The only exceptions to these legal authorities are those lakes that have one hundred percent National Forest ownership of the shoreline. Watercraft limitations and closures then fall under the authority of the Forest Supervisor.

PC#: 156
Public Concern: The revised Forest Plan should permit Off-Highway Vehicle users to use most forest roads and designated trails but not be permitted to travel cross-county. In fact, more miles of trail should be developed because current routes are very limiting in their recreational value.

Response: The revised Forest Plan provides direction for Off-Highway Vehicle use on designated trails on page II-13. Cross-country use of Off-Highway Vehicles is prohibited. The Huron-Manistee National Forests provides more than 700 miles of Off-Highway Vehicle trails, excluding snowmobiles. In addition, trucks and street-legal motorcycles may use the 3,243 miles of Forest roads, and an additional 6,670 miles of state and county roads within the Forest Boundary. The revised Forest Plan does not preclude the addition of system trails, nor does it

propose to eliminate any trails. Site-specific analysis of a proposed trail would need to meet trail density guides as set forth in an individual management area prescription.

PC#: 157
Public Concern: Off-Highway vehicle users should be required to purchase a federal Off-Highway Vehicle sticker in order to fund Off-Highway Vehicle management.

Response: Off-Highway Vehicles are required to have current Off-Highway Vehicle stickers purchased from the State of Michigan to use the designated trail system. The State of Michigan uses funds from the purchase of stickers to provide grants that are used to create and maintain Off-Highway Vehicle trails on public lands. The Forests have changed the revised Forest Plan on page II-12, VIII, A, 4 to read, "Emphasize volunteer and cooperative agreements and grants to construct, maintain, and administer trail systems."

PC#: 158
Public Concern: The Huron-Manistee National Forests should designate and design motorized trails specifically for 4-wheel drive vehicles and not simply allocate roads for 4-wheel use.

Response: On the Huron-Manistee National Forests, Off-Highway Vehicle trails are designed to accommodate vehicles 50 inches wide or less (revised Forest Plan, page II-13, VIII, D, 8). Trails for larger vehicles may be developed after a site-specific analysis consistent with management area direction. This is unlikely as current road densities discourage new trails from being developed. Street legal vehicles, larger than 50 inches, may use the forest road system.

PC#: 159
Public Concern: The Huron-Manistee National Forests should establish a policy that permits physically disabled individuals to access areas with an off-highway vehicle, even if not normally permitted.

Response: We appreciate and recognize your desire to access National Forest System lands. The Huron-Manistee National Forests has over 3,000 miles of roads open to licensed vehicles, and approximately 500 miles of trail open to Off-Highway Vehicles. Most areas are accessible by some type of vehicle.

Since the 1980s, the Huron-Manistee National Forests have had a policy of restricting Off-Highway Vehicles to trails specifically designated as open for that use; all other areas of the Forests have been closed to these vehicles. This policy was incorporated in the Huron-Manistee's 1986 Forest Plan (revised Forest Plan, Standards and Guidelines, page II-13). This policy is consistent with the Michigan Department of Natural Resources policies on Off-Highway Vehicle use in the Lower Peninsula.

It is legal to use an Off-Highway Vehicle to retrieve a deer as long as the Off-Highway Vehicle is used on an existing trail designated for that use and the use is compliant with other state regulations; however, cross-country use is prohibited. The Forest Service does not have a permit that provides special access for persons with disabilities. The Michigan Department of Natural Resources issues permits to persons with disabilities, entitled "Affidavit for Off-Highway

Vehicle Handicapper Privileges." The Huron-Manistee National Forests do recognize the Michigan Department of Natural Resource's Affidavit. The Affidavit gives the holder who has a disability a special privilege to operate an Off-Highway Vehicle on all forest roads on state-owned land. However, the Affidavit states "privileges do not extend to cross country use, nor to areas, trails and roads specifically CLOSED to Off-Highway Vehicle use, nor to the operation of an Off-Highway Vehicle within federal forest lands, a state park, state recreation area or Michigan trailway." The Forest policy is consistently applied across the Huron-Manistee National Forests and was not intended to discourage any person from using the National Forests.

PC#: 160
Public Concern: The Huron-Manistee National Forest should not allow snowmobiles to use all unplowed forest roads. The Final Environmental Impact Statement does not adequately explain why snowmobiling is an important activity. The Final Environmental Impact Statement does not give an adequate basis for increasing the National Visitor Use Monitoring recreational statistics. Off-Highway Vehicle and snowmobile use should be kept to a minimum because there is no question that these vehicles inflict damage to Forest habitat, besides conflicting with non-motorized trail users.

Response: The 1986 Forest Plan states, "….prohibit snowplowing of roads under Forest Service control from December 15 to March 15, when the road is part of a designated winter trail system." The plan also states, "Trail management will be compatible with the Recreation Opportunity Spectrum objective of the area."

The revised Forest Plan states, "Avoid snowplowing of roads under Forest Service control from December 1 to March 31, when the road is part of a designated winter trail system." In addition, it states, "….restrict Off-Highway Vehicle travel, including snowmobiles, to designated trails of areas unless otherwise provided for by law, regulation, or by special are management objectives." The revised plan also states, "Trail management will be compatible with the Recreation Opportunity Spectrum objective of the area."

The National Visitor Use Monitoring survey is one tool in monitoring visitor use on National Forest lands. Additional monitoring tools sponsored by the Forest Service, State of Michigan, and/or private partners are used to provide a complete picture of the uses that occur on National Forest lands and the effects on natural resources and social environments.

PC#: 161
Public Concern: The Huron-Manistee National Forests should regulate motorized use of the Forests, including an analysis of trails and development of an environmental impact statement of the statewide snowmobile trail system because Off-Highway Vehicle use, mountain bike races, and snowmobile trails are examples of uses that only hasten the deterioration of the land and water under the care of the Forest Service where there are never enough resources for enforcement.

Response: The Huron-Manistee National Forests do regulate motorized use of the Forests but also recognize that resource damage from illegal motorized use does occur. Law enforcement resources are planned, funded, and allocated through administrative processes separate from the

forest planning process according to existing statutes, regulations, and Forest Service policy (Forest Service Manual 5302 and Forest Service Handbook 5309.11 and others). The statewide snowmobile trail system is outside the scope of Forest Plan revision. Any proposals to develop or modify snowmobile trails are evaluated through a site-specific analysis. Road closure methods and effectiveness are evaluated on a site-specific basis and are not a Forest Plan revision issue. However, we continue to work with agencies and partners to acquire public input and participation in developing site-specific resource management analyses and evaluations.

PC#: 162
Public Concern: The Final Environmental Impact Statement should disclose snowmobiles as a source of noise and snowmobiles should be restricted from Bear Swamp. Additionally, the revised Forest Plan should explicitly explain what vehicles are allowed on trails in the summer and winter.

Response: Snowmobiles are recreational vehicles and are identified as a source of noise in the Final Environmental Impact Statement, page III-276. There is a guideline on page III-9.1-3 of the revised Forest Plan that states use of motorized vehicles should not be allowed in 9.1 areas, including Bear Swamp. However, exemptions will be described in the Research Natural Area Establishment Record and Management Plan. The Forests have attempted to relocate the snowmobile trail away from the proposed Bear Swamp Research Natural Area. Because of the lack of federal land ownership in this area, the Forests have been unable to find an alternative route. For this reason, the trail will remain in its present location until resource conditions change, at which time, a site-specific analysis with public involvement, will be conducted.

The Forest Service is a multiple use agency and provides a variety of trail opportunities for Off-Highway Vehicles, dirt bikes, and snowmobiles on designated trails only. The only change being proposed in the revised Forest Plan is that open, unplowed Forest Service roads will be designated for snowmobile use in the winter (revised Forest Plan, page II-13).

PC#: 163
Public Concern: The Huron-Manistee National Forests should adopt a motorized trail policy of "closed unless posted open." In addition, the Final Environmental Impact Statement should disclose the effects the various management prescriptions and Standards and Guidelines have on the ability of the Forests to actively manage motorized trails. For example, on page II-13, Off-Highway Vehicles, D 2 and D 3; it is unclear whether D3 is more restrictive than D2. In addition, the Standard and Guideline on page II-13, D.10 is not uniform with state law.

Response: The policy of the Huron-Manistee National Forests is consistent with National policy; that is, to designate trails open for the specific uses allowed on each trail. The reference given in the revised Forest Plan, Chapter II, page II-12, refers to mountain bike use on roads, not trails. Management prescriptions and Standards and Guidelines were analyzed and disclosed in the effects section in the Final Environmental Impact Statement, pages III-299 – III-307. There are no prescriptions or Standards and Guidelines that prevent the Forests from actively managing recreational resources. For example, on page III-305, Final Environmental Impact Statement, Chapter III, Motorized, states that, "All of the alternatives have a standard and guideline for trail density, number of miles of motorized trails per square mile of National Forest System lands, in

the various management areas." Further, this section further states that the trail density guideline would not limit future trail expansion.

The comment, concerning the Standard and Guideline, revised Forest Plan, page II-13, Off-Highway Vehicles, D2 and D3, is correct. D3 is more restrictive than D2. The standards are different because D2 refers to distance from houses while D3 refers to distance from bodies of water. D3 contains a greater distance due to concern about erosion and other potential impacts to watershed.

The Standard and Guideline on page II-13 D -10 is correct. This is a guideline intended to reduce the amount of mixed street legal traffic on forest roads with snowmobiles on rights-of-way to address safety issues.

PC#: 164
Public Concern: The revised Forest Plan should provide for rescinding the permission for snowmobiles to use county roads in Management Area 6.1, if the frequency of violations increases.

Response: The administration of county roads is outside the jurisdiction of the Forest Service and is therefore, not addressed in the revised Forest Plan. The Forest Supervisor has authority to close forest roads and trails where resource damage is occurring until it is repaired and threat of reoccurrence has been eliminated.

PC#: 165
Public Concern: The Huron-Manistee National Forests should not allow any Off-Highway Vehicles anywhere, either off-road or on-road, on National Forest System land.

Response: The Selected Alternative strives to achieve a balance between and integration of ecological, economic, and social factors into a comprehensive strategy aimed at protecting and enhancing sustainability, diversity, and productivity of the Huron-Manistee National Forests' natural resources. According to the Multiple-Use Sustained-Yield Act of 1960, motorized recreation opportunities should be provided where applicable. The revised Forest Plan provides direction that addresses the needs of motorized recreational users, limits unacceptable resource damage, and minimizes conflicts with other recreation activities.

The Final Environmental Impact Statement analyzed a variety of Alternatives with different outcomes to address Plan Revision issues (Final Environmental Impact Statement, Chapter II, page II-3). Included was "passive" management, which minimized motorized recreational development. Because this alternative did not respond to the Forest Plan revision issues or maintain species viability, it was eliminated from further consideration.

PC#: 166
Public Concern: There is a lack of adequate range of Alternatives. No alternative included options for expanding Off-Highway Vehicle use to meet the current and anticipated demand while also protecting resources. It is imperative that a sufficient number of acres remain open to

Off-Highway Vehicle use so that the Huron-Manistee Forests can achieve their own goal of providing a multi-use forest.

The Huron-Manistee National Forests should keep our land open to the public. I would hate to see the lands that I have come to love suddenly become off limits to my son and future generations.

The Huron-Manistee National Forests should realize that people want to recreate in the forest, not just be able to drive by the edge and look at the boundaries. The demographics of users are younger or older families, neither of which are able to hike in several miles to view the woods, younger because they have small children, and older because they may be physically incapable.

The Huron-Manistee National Forests should not construct any 4-lane highways through the forest. Do not build anymore.

Response: The Forests' Analysis of the Current Management Situation, conducted in 2003, identified that there were no critical or compelling reasons to change the direction or strategy for access contained in the 1986 Forest Plan. During the Analysis of the Current Management Situation, the Huron-Manistee National Forests determined that the original 1986 Forest Plan provided sufficient direction to appropriately manage issues related to recreational access. The Forests determined that unless substantive new information was revealed, the Forest Plan revision process would not include access issues.

While certain activities must be managed to protect resource values for future generations, the Huron-Manistee National Forests are and will continue to be open to the public to use and enjoy.

The Huron-Manistee National Forests are highly accessible and have a very dense network of both classified and unclassified roads. There are almost no instances where one can walk several miles to access any portion of either Forest.

Although major roads cross National Forest System Lands, the Huron-Manistee National Forests have not and do not intend to construct any four-lane highways through the National Forests.

PC#: 167
Public Concern: The Huron-Manistee National Forests should make guidelines D3, (which is more restrictive than D2) and D2 uniform or explain the rational why they are not.

Response: 2300: VIII. D3 States, "Where possible, motorized vehicle trails will be located a minimum of 1,000 feet from rivers, streams, and lakes except at designated crossings." This guideline, in the 1986 Forest Plan, limited motorized vehicle trails to areas one half mile beyond lakes and streams except at designated crossings. The guideline has been relaxed somewhat to provide for more resource management flexibility in the revised Forest Plan, but maintains a minimum distance of 1,000 feet from rivers, streams, and lakes to protect resources values. The rational for this guideline is unrelated to D2, which states, "Where possible, do not construct motorized trails within 660 feet of any seasonal or permanent residence," and therefore uniformity between the two guidelines is not expected or necessary.

Natural Resource Management – General:

PC#: 168
Public Concern: The revised Forest Plan should, as its first management priority, to provide for the recovery of endangered and threatened species. Secondly, the Forest Plan should provide for high quality, non-motorized recreation opportunities while protecting wildlife and preserving water quality. Overall, the Huron-Manistee National Forests should emphasize environmental preservation, protection, and restoration, and eliminate commercial logging, other resource extraction, new road construction, Off-Highway Vehicle use, and the Huron-Manistee National Forests should be analyzed for potential National Recreation Areas.

Response: Preservation and restoration of the environment is one of many management emphases utilized in the revision of the Huron-Manistee National Forests' Plan.
The Multiple-Use Sustained-Yield Act of 1960 states that, "it is the policy of the Congress that the National Forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes." Management of National Forests includes management of uses of all the various renewable surface resources in a combination that best meets the needs of the American people. The Selected Alternative strives to achieve a balance between and integration of ecological, economic, and social factors into a comprehensive strategy aimed at protecting and enhancing sustainability, diversity, and productivity of the Huron-Manistee National Forests' natural resources.

National Recreation Areas are designated by law or administratively. They must possess unique recreational, aesthetic, historical, archaeological, and natural resource values as defined in the Forest Service Manual 2370. No areas on the Huron-Manistee National Forests attain the unique requirements for a National Recreational Area.

PC#: 169
Public Concern: The revised Forest Plan should speak-to and ultimately accomplish planned forest treatments.

Response: The Huron-Manistee National Forests revised Forest Plan and the Final Environmental Impact Statement are the framework for funding projects and accomplishing objectives. In order to achieve the desired conditions and accomplish objectives, the Forests need to treat the specified acres, and implement the wildlife and other resource projects identified in the revised Forest Plan. However, funding levels on the Forests to accomplish the program of work are part of an overall funding allocation determined by Congress and the Administration. The Forests must work within the budget that is allocated. The Forests make requests for funding based on projected accomplishments in the revised Forest Plan.

PC#: 170
Public Concern: The Huron-Manistee National Forests should develop a process to accomplish and maintain an inventory system that would result in site-specific stand prescriptions.

Response: The Huron-Manistee National Forests maintains vegetative data in the Combined Data Systems database, which is used on the Forests when conducting a variety of analyses, such as, Environmental Assessments and Environmental Impact Statements, at the project level. This gives resource managers the information they need when determining the effects of potential on-the-ground activities within specific areas of the Forests.

Nonmotorized Recreation:

PC#: 171
Public Concern: The Forest Plan should protect plants and animals, but this protection should not come at the expense of access to rivers by canoeists.

Response: The revised Forest Plan does not propose a reduction in access to rivers.

PC#: 172
Public Concern: The Final Environmental Impact Statement should specify the amount of increased mountain bike trails are proposed for Alternatives B and C for comparison to Alternative A.

PC#: 173
Public Concern: The Forest Plan should allow mountain bike use on all trails where feasible, unless posted closed or seasonally restricted, because mountain bike use is allowed on all Forest Service roads.

Response: Mountain bikes are allowed on all open roads and on designated mountain bike trails. The Huron-Manistee National Forests policy of designating trails as open to a use, as opposed to posting them closed to a use, is consistent with National Direction and State of Michigan policy. The Standards and Guidelines have been amended to include *designated trail* in the revised Forest Plan, page II-12, VIII, A, 8. The Selected Alternative allows for the possibility of designating sections of existing trail for mountain biking opportunities on a site-specific basis. Because the site-specific analysis has not been completed on potential modifications to the existing trail uses, a definitive number of miles cannot be provided.

PC#: 174
Public Concern: The Huron-Manistee National Forests should create more trails, nonmotorized, as well as motorized. The Final Environmental Impact Statement failed to interpret the National Visitor Use Monitoring in terms of hiking and walking use compared to backpacking on the Forests.
Mountain bikers should not be allowed to ride on hiking trails. Mountain bikes should be allowed on all trails where feasible, unless posted closed or seasonally restricted.

The Final Environmental Impact Statement inappropriately states, “This increased opportunity and growing demand could increase conflicts with hikers. Hikers and bikers could select alternative trails or may not participate. Some hikers could choose other locations off-forest…User satisfaction may decrease for those who enjoy single use trails.” (Final

Environmental Impact Statement, pages III-289 and III-290). It appears that this group of forest users is being told, “If you don't like it, go somewhere else.”

Response: The Final Environmental Impact Statement, page III-300, has been corrected in regards to hiking demand. Hiking and backpacking are not separate categories in the National Visitor Use Monitoring system.

Alternatives B and C acknowledge the current use of mountain bikes on National Forest System lands. Alternative A, the original 1986 Forest Plan as amended, did not address mountain bikes. The increase in mileage open to mountain bikes is found in the Final Environmental Impact Statement, pages III-303 through 307 and reflects the difference between no mountain bike use considered in Alternative A and the expected mountain bike use of designated existing trails in Alternative B and C. Mountain bikes are allowed on all open roads and on designated trails. The Huron-Manistee National Forests policy of designating trails as open to a use, as opposed to posting them closed to a use, is consistent with National Direction and State of Michigan policy.

The characterization of potential effects because of increased user conflicts, “If you don't like it, go somewhere else,” is definitely not a proposed response by the Huron-Manistee National Forests. Rather, statements detail the Huron-Manistee National Forests expectations of what would most likely occur through implementation of the various alternatives. The revised Forest Plan trail density guidelines do not limit future trail expansion in any of the alternatives with one exception: Management Area 7.1 (Final Environmental Impact Statement, pages III-299 through 307). This involves a site-specific issue; analysis would occur during the project implementation level and disclosed during the environmental analysis process. The Selected Alternative retains motorized and nonmotorized recreation opportunities. The revised Forest Plan does not call for the closure of any specific roads or trails. Road and trail closures are implemented on a case-by-case basis following site-specific environmental analysis and public involvement.

PC#: 175
Public Concern: The Forest Plan, Chapter II, Table II-6, page II-12 conflicts with the Desired Future Condition statements on page III-7.1-2.

Response: The revised Forest Plan, Table II-6, does not conflict with the desired future condition for 7.1 Management Area characterized on page III-7.1-2. The desired future condition on page III-7.1-2, states, “Nonmotorized use is emphasized, providing primarily hiking, cross-country skiing, and equestrian travel.” This is not in conflict with the Nonmotorized trail density guideline of 0 to 6 miles of trail contained in Table II-6.
Concurrently, there is a short snowmobile trail segment that crosses the area in the southwest corner that is about one-half mile long, which is within the guideline enumerated in Table II-6, or Motorized: 0 to 1 mile.

PC#: 176
Public Concern: The Forest Plan should emphasize dispersed camping through education, partnerships, utilization of mitigating measures to reduce negative sites problems that might occur with dispersed camping, streamlining special recreation permits, access, and through the

implementation of other proactive management techniques. The definition of dispersed camping should be added to the revised Forest Plan Glossary.

Response: The Huron-Manistee National Forests revised Forest Plan allows for dispersed camping. The suggested goals and/or objectives pertain to developed campsites and are not relevant for dispersed camping. The need to manage individual dispersed camping areas to deal with resource impacts is determined on a site-specific basis, according to Management Area direction and resource issues involved. The revised Forest Plan allows for education and dissemination of information about camping.

A definition of dispersed camping has been added to the revised Forest Plan Glossary, Appendix F, and the Final Environmental Impact Statement, Glossary, Appendix J.

North Country Trail:

PC#: 177
Public Concern: The Huron-Manistee National Forests should state a firm commitment to remove bicycles from the North County National Scenic Trail.

Response: The revised Forest Plan complies with the Memorandum of Understanding between the Forest Service, National Park Service, and the North Country Trail Association, Inc.

PC#: 178
Public Concern: The Forest Plan should discuss the Memorandum of Understanding between the Huron-Manistee National Forests, National Park Service, and the North Country Trail Association and include the Trail Handbook for Trail Design, Construction, and Maintenance and the Huron-Manistee North Country National Scenic Trail Implementation Guide.

Response: The revised Forest Plan, page II-14, Section X, A, has been edited to include the Memorandum of Understanding between the Forest Service, the National Park Service, and the North Country Trail Association.

In regards to the trail handbook, the Forests will follow laws, regulations, and policy. Repeating these is not necessary for the revised Forest Plan. A Standard and Guideline was added to in Chapter II, 2300, X, B - the North Country National Scenic Trail Standards and Guidelines, and states, “Management of the North Country National Scenic Trail will be in accordance with pertinent requirements and management policies such as the Huron-Manistee National Forests' North Country National Scenic Trail implementation guide.”

PC#: 179
Public Concern: The Final Environmental Impact Statement mentions the North Country Scenic Trail, but specific cumulative effects are not considered.

PC#: 180
Public Concern: The Forest Plan should disclose the Scenery Management System for the North Country National Scenic Trail corridor.

Response: There are no large-scale activities in the revised Forest Plan, which would have negative cumulative effects on the North Country National Scenic Trail (Final Environmental Impact Statement, Chapter III, page III-305). Projects will be analyzed on a site-specific basis and will adhere to the North Country National Scenic Trail Management Plan.

The corridor of the North Country National Scenic Trail is not a separate Management Area. Therefore, the Scenery Management System for the North Country Trail is consistent with the Management Areas the North Country Trail passes through. A description of the sensitivity levels and integrity objectives of each Management Area can be found in the revised Forest Plan, Chapter II, page II-15. The scenic integrity level within the foreground distance zone of the North Country Trail will not be lower than moderate (revised Forest Plan, Chapter II, page II-15).

PC#: 181
Public Concern: The Forest Plan, page II-14, Standards and Guideline F states, "The North Country National Scenic Trail should be for hiking and backpacking." This guideline does not allow a change in the primary use should the demand for mountain biking increase and the demand for hiking and backpacking decrease.

Response: The North Country National Scenic Trail was designated by Congress as primarily a hiking trail. A management plan for the trail was completed in 1982 by the National Park Service in cooperation with the participating States. Changing the direction for use of the North Country National Scenic Trail is outside the scope of Forest Plan revision.

PC#: 182
Public Concern: The Final Environmental Impact Statement, page II-7, should include the North Country Trail in the section titled, "Recreation, semiprimitive areas, aesthetics & access", and the section retitled, "Wilderness, Wild and Scenic Rivers, and Specially Designated Areas."

Response: The title was changed to Wilderness, Wild and Scenic Rivers, and the North Country National Scenic Trail and bullets was added. Other specially designated areas are either addressed in their own Management Areas or addressed in Management Area 8.1: Special Areas.

PC#: 183
Public Concern: The Forest Plan should include the route of the North Country Trail on all maps associated with the plan.

Response: The Forest Plan revision maps identify Management Areas. Major travel routes are included for the public to orient themselves. No further features are included because it would clutter the map at the Forest scale. However, the North Country National Scenic Trail is included in the Forest Visitor Maps.

PC#: 184
Public Concern: The Forest Plan should provide for a method of indicating the Forest Service's progress on attaining the Desired Future Condition for the North Country Trail. The monitoring

matrix should include information on how many miles of the North Country Trail has been changed from "open to bike" to "hiking only."

Response: There is no change to mountain bike use proposed on the North Country Trail. The progress toward attainment of the desired future condition would be provided in Monitoring and Evaluation reports. In accordance with the Monitoring Matrix in Chapter IV of the revised Forest Plan, monitoring will identify which trail and the number of miles open to mountain bikes.

PC#: 185
Public Concern: The Forest Plan should prohibit the use of llamas on the North Country Trail.

Response: When the Huron-Manistee National Forests evaluated the use of horses in the 1986 Forest Plan, hoofed animals were found detrimental. Llamas are not hoofed animals, and therefore, are not detrimental to the trail. There is no reason to restrict their use. The Standard and Guideline, revised Forest Plan, Chapter II, 2300, X, D, was changed to; "The North Country National Scenic Trail is closed to motorized use." Possessing or using saddle, pack, or draft animals is also prohibited. Llamas are allowed on the trail.

Northern Hardwoods-Oak:

PC#: 186
Public Concern: The Forest Plan should be changed to include harvest projections for northern hardwoods in the first decade.

Response: It is correct that the Spectrum model did not project harvests for northern hardwood for the first decade in the Selected Alternative. Seventy-three million board feet of timber harvest are projected in the second decade. It should be noted, however, that these are model-derived projections. Undoubtedly, some amount of acres of northern hardwoods will be harvested when project level management objectives are implemented. These projects will be implemented on a case-by-case basis under site-specific environmental documentation with public involvement. Goals and Objectives, Desired Future Conditions, and Standards and Guidelines allow the Forests flexibility in managing northern hardwoods. To analyze a range of alternatives, Alternative A does include higher projected outputs of northern hardwood forest products. The differences between the alternatives are disclosed in the Final Environmental Impact Statement, Chapter III.

PC#: 187
Public Concern: The Final Environmental Impact Statement should establish that the oak type could be maintained, as it is questionable from a study of Table III-20 through 23 figures. If the Forest Plan does not maintain the oak type, then the tables should demonstrate the conversion of oak to other forest types. The conversion of 20,300 acres of oak to barrens is unacceptable.

Response: The revised Forest Plan is meant to guide management activities for a 10 – 15 year period. It is a dynamic document that will be periodically examined and adjusted when new information becomes available or circumstances change. While the planning horizon for the revised Forest Plan is 50 years, and it analyzes all activities and future conditions and

effects of alternative actions, the implications of decisions made on complex forest systems become too difficult to understand 15 – 50 years in the future, and beyond. For that reason, extensive successional pathways were not modeled. Table III-23 depicts relatively large acres of oak extending beyond 100 years. However, what the Forests will look like in 100 years is a projection.

High site oak stands are likely to exist well beyond 100 years due to the longevity of species such as red and white oak even though the model predicts a net loss of approximately 23,000 acres of all oak types after 100 years. The revised Forest Plan proposes to regenerate 6,838 acres of low site oak in the first decade. Oak will still be present in the pine barren and savannah habitats where the acres of low site oak vegetative class are reduced.

PC#: 188
Public Concern: The Huron-Manistee National Forests should not convert slow developing, marginally stocked oak stands to barrens and fuel barriers resulting in dried-out soil conditions. Oak should be managed aggressively so that the type does not decline because wildlife requires acorns to survive through winters.

Response: Restoration of barrens and fuels treatments are intended to provide habitat for species with viability concerns and to reduce the chance for adverse impacts associated with wildfire, respectively. It is important to note that although vitally important for certain species viability, the actual amount of barrens habitat creation proposed over the planning horizon is less than 60,000 acres. This is less than one-tenth of one percent of total lands managed by the Huron-Manistee National Forests. Oak is still prominent across National Forest System lands. As disclosed in the Final Environmental Impact Statement, Table III-20, beginning on page III-221 through 223, 168,027 acres of oak habitat type is expected to be maintained through the 50-year planning horizon. The revised Forest Plan proposes to regenerate 6,838 acres of low site oak in the first decade. The Spectrum model projects a net loss of approximately 23,000 acres of oak types after 100 years. Oak will still be present in the pine barren and habitats where the acres of low site oak vegetative class are reduced. Mast is important to wildlife species. Guidelines in the revised Forest Plan , page II-23, Table II-12, prescribes a minimum number of mast trees to be retained during harvest. It is also important to harvest oaks to regenerate them to maintain the oak type.

Old Growth:

PC#: 189
Public Concern: The Final Environmental Impact Statement should disclose the impact that old growth designations within river corridors have had on migratory birds, particularly woodcock.

Response: Woodcock have been included and addressed in the revised Forest Plan through the Species Viability Evaluation process and is disclosed in Appendix B of the Final Environmental Impact Statement. It was determined in Step 1 of the Species Viability Evaluation that woodcock was not a species with a viability concern on the Huron-Manistee National Forests. Management of aspen, openings, and shrub/scrub habitat, which would benefit woodcock, is included in both

Alternatives B and C. Therefore, management occurring outside of old growth will maintain the viability of the species on the Huron-Manistee National Forests.

Direction in the revised Forest Plan provides a range of management options providing for a mix of late and early successional habitat in riparian areas outside of old growth. Management direction in the Plans allows a range of vegetative management practices or silvicultural treatments to be used in riparian areas, including treatments needed to maintain early successional forests, provided such use is appropriate on a site-specific basis. The near-bank riparian management zone adjacent to lakes, streams, or open water wetlands is not a "no cut" zone. Rather, it is a zone where active management, including timber harvest geared to even-aged management, can be used, provided it is used to help maintain or restore riparian ecological function. On a site-specific basis, the use of timber harvest to promote early successional or young-age forest to benefit species such as woodcock is considered in keeping with this direction. Likewise, direction for the remainder, such as, outer riparian management zone allows even-aged timber harvest practices for any site-appropriate early or late successional tree species, while favoring harvest at extended rotations. The Final Environmental Impact Statement and revised Forest Plan provide this flexibility through riparian-specific management direction through Goals and Objectives, Desired Future Conditions, and Standards and Guidelines (Chapter III, pages III-22, III-75, III-98, among others in the Final Environmental Impact Statement; and, Chapter II, pages II-5, II-18, II-19, II-22, among others in the revised Forest Plan).

PC#: 190
Public Concern: The Forest Plan should maintain the current 2,000 acres of managed wildlife openings within old-growth areas.

PC#: 191
Public Concern: The Huron-Manistee National Forests should meet the requirements of renewable resources and sustainability in the management of aspen and oak forest types, which are declining because of old-growth policies and allowing aspen and oak to convert to other forest types.

PC#: 192
Public Concern: The Huron-Manistee National Forests should provide for the preservation and reestablishment of old growth forest, emphasize biodiversity, and multiple use over timber production. Standards and Guidelines are inadequate for management of old growth stands and stands adjacent to old growth. The Final Environmental Impact Statement should apply new scientific data to old management and the revised Forest Plan should include specific guidelines for monitoring old growth objectives.

PC#: 193
Public Concern: The Forest Plan should designate old growth core areas connected by corridors rather than concentrating old growth along riparian areas.

PC#: 194
Public Concern: The Huron-Manistee National Forests should offer the opportunity to revisit the old growth issue design because the design is flawed.

PC#: 195
Public Concern: The Huron-Manistee National Forests should designate much less of the Forests as old growth as it is not conducive to multiple use principles, creates a fire hazard, and is not supported by forest users.

PC#: 196
Public Concern: The Final Environmental Impact Statement should disclose that old growth has a high risk of catastrophic wildfire.

PC#: 197
Public Concern: The Huron-Manistee National Forests should designate more old growth resulting in more tourism.

PC#: 198
Public Concern: The Huron-Manistee National Forests should not constrain resource management by designating old growth and should not deny access to old growth by motorized trail users.

Response: The Huron-Manistee National Forests' old-growth design and designation was updated in March 2003. Amendment #24 to the 1986 Forest Plan describes the changes made. While not agreeable to everyone, this amendment addressed a variety of issues and concerns regarding old-growth management on the Forests.

In 2003, Amendment #24 resolved the old-growth issue. The concerns and issues raised during the Need for Change process for Forest Plan revision in 2003 were similar to ones brought forward and addressed during the amendment process. As such, it was determined that design, acres designated, and management (including motorized access), of old growth *would not* be an identified as a need for change item in Forest Plan revision. Potential impacts to old growth, due to other proposed changes, however, were analyzed and disclosed in the Final Environmental Impact Statement, pages III-44, III-245, and Tables III-20 through III-23, beginning on page III-221. The revised Forest Plan provides for wildfire suppression and fuels treatment in old growth, where there is a concern for public safety (Chapter III, page III-255, Final Environmental Impact Statement).

PC#: 199
Public Concern: The Forest Plan should contain a map of old growth areas and a map of suited and unsuited timber land. The maps associated with the roads analysis are useless.

Response: Maps of the old-growth design are now included in the revised Forest Plan as determined in the Amendment #24 decision to the 1986 Forest Plan. They are also available in the project file. Old-growth maps have been included in the Final Environmental Impact Statement.

Regarding the roads analysis, only levels 3, 4, and 5 roads were analyzed at the Forest level. Level 1 and 2 roads are local and are expected to be analyzed at the site-specific project level. The existing maps are adequate for Forest Plan revision

PC#: 200
Public Concern: The old growth definition does not address ecosystems such as pine barrens that could be considered old growth.

Response: The definition of "old growth," as provided in the glossaries of the revised Forest Plan and Final Environmental Impact Statement is consistent with the definition of "old growth forests" provided in the Environmental Assessment for the Old Growth Amendment to the 1986 Forest Plan (Amendment # 24, February 28, 2001). Confusion exists because the Forests' *old-growth design* is a contiguous geographical area where all landtype associations are represented and natural ecological processes are allowed to predominate. This may result in the establishment of natural and ecologically significant open areas or early successional forests. Though not traditionally considered "old growth," these unforested or young forested conditions would be expected to occur within the Forests' *old-growth design*. In accordance with Amendment #24, 10,000 acres within the Forests' *old-growth design* are expected to be managed as barrens/prairies/or savannahs.

The definition of "old growth" in the revised Forest Plan and Final Environmental Impact Statement was edited to incorporate these concepts as follows:

Old Growth: Ecosystems where natural biological processes predominate and are characterized by older larger trees, native species, and minimal human disturbance. Old-growth structural diversity includes multi-layered canopies, canopy gaps, tip-up mounds, and an accumulation of dead woody material. Old-growth tracts vary from small isolated forested areas to larger landscape complexes that may include ecologically important non-forested openings, younger patches produced by natural disturbances, wetlands, and water bodies.

Research Natural Areas:

PC#: 201
Public Concern: The Huron-Manistee National Forests should not establish any new candidate Research Natural Areas and should not designate any new ones because Research Natural Areas: 1) are underutilized, 2) have no demonstrated need; 3) are opposed by the majority of forest users; 4) limit recreational use; and 5) prevent necessary vegetative management in perpetuity. The Huron-Manistee National Forests should not designate any Research Natural Area outside of designated Wilderness areas and should not exceed the minimum size requirements, such as 80 to 160 acres

Response: The Huron-Manistee National Forests establish Research Natural Areas as part of meeting multiple use management objectives and in adherence to policy direction. Out of approximately 1 million acres of National Forest System lands, 1,363 acres are designated as Research Natural Areas. The revised Forest Plan moves approximately 14,000 acres into Candidate Research Natural Areas/Research Natural Area status (Management Areas 9.1 and

9.2). The effects of moving these acres from the Management Areas that they currently reside in to Management Areas 9.1 and 9.2 are disclosed throughout the Final Environmental Impact Statement where comparisons of Alternatives by Management Areas are found. The process for designating candidate Research Natural Areas as Research Natural Areas includes the development of management plans and will occur in the future. Public involvement will be included in the process of writing management plans.

Regarding size of Research Natural Areas, Forest Service Manual direction (4063.1) states "-Size Standards. Research natural areas must be large enough to provide essentially unmodified conditions within their interiors. In the West, 300 acres (121.4 hectares) of land is generally considered the minimum size. In the East, where it may be impossible to find areas of 300 or more acres, consider establishing smaller areas, especially in grassland systems and in areas with special vegetative, aquatic, or geologic situations. Incorporate enough acres to ensure unmodified conditions within their interiors and to protect the features and/or qualities for which the research natural area is to be established."

Forest Service Manual direction (4063-Research Natural Areas) states, "Research Natural Areas are part of a national network of ecological areas designated in perpetuity for research and education and/or to maintain biological diversity on National Forest System lands. Research natural areas are for nonmanipulative research, observation, and study." Objectives of establishing research natural areas (Forest Service Manual 4063.02) are:

- Preserve a wide spectrum of pristine representative areas that typify important forest, shrubland, grassland, alpine, aquatic, geological, and similar natural situations that have special or unique characteristics of scientific interest and importance that, in combination, form a national network of ecological areas for research, education, and maintenance of biological diversity.
- Preserve and maintain genetic diversity.
- Protect against serious environmental disruptions.
- Serve as reference areas for the study of succession.
- Provide onsite and extension educational activities.
- Serve as baseline areas for measuring long-term ecological changes.
- Serve as control areas for comparing results from manipulative research.
- Monitor effects of resource management techniques and practices.

Current-use patterns for Research Natural Area information do not predict future needs for base-line data. If these areas are not identified and managed appropriately now, they may not be suitable when research need arises. Therefore, Forest Service Manual direction requires that Research Natural Areas be established in a "wide-spectrum" of representative areas. They also may assist in implementing provisions of special acts, such as the Endangered Species Act and the monitoring provisions of the National Forest Management Act.

The revised Forest Plan provides Standards and Guidelines for wildlife habitat management in a variety of habitats across the Forests. The potential impacts on wildlife of designating Research Natural Areas are described in Chapter III of the Final Environmental Impact Statement under

effects of Alternatives C on Endangered, Threatened, and Sensitive Animals and Plants, and under effects on Management Indicator Species.

Research Natural Area designations can be changed but require approval by the Regional Forester and would also require a Forest Plan amendment.

PC#: 202
Public Concern: The Huron-Manistee National Forests should designate 3 new Research Natural Areas and establish the16 potential candidate Research Natural Areas, noted as the last bullet under "Wildlife and Rare Plants" on page II-11 of the Draft Environmental Impact Statement to: 1) maintain the ecological integrity of significant natural community occurrences; 2) protect special and unique areas; 3) protect/preserve Michigan's biodiversity; 4) and to keep rivers healthy and unpolluted so fish won't be contaminated.

Response: The Draft Environmental Impact Statement analyzed a variety of Alternatives with different outcomes to address Plan Revision issues. Among these was an Alternative that designated three new Research Natural Areas and identified 15 potential candidate Research Natural Areas. The Draft Environmental Impact Statement incorrectly referred to 19 candidate Research Natural Areas. There are actually 18. This correction has been made. Each Alternative meets the intent of relevant laws, including the Multiple-Use Sustained-Yield Act of 1960, under which the National Forests are managed. The Regional Forester considered all of the Alternatives and the Record of Decision describes his rational for the Selected Alternative. The Selected Alternative represents what forest managers believe to be the best balance in achieving sustainable ecosystems and meeting the intent of relevant laws, and addressing the issues and concerns specific to the Huron-Manistee National Forests.

PC#: 203
Public Concern: The Huron-Manistee National Forests should designate the remaining candidate Research Natural Areas to provide large natural areas where we can bird, hike, and see native wildlife.

Response: Establishment of Research Natural Areas beyond the three identified in Alternative C was not considered as part of any Alternative. These Research Natural Areas (Brandy Brook, Big South, and Bear Swamp) were selected for establishment under Alternative C because draft establishment records had already been completed. To designate all of the remaining candidates in Alternatives B and C, establishment records would need to be completed. The Forests determined that it was unrealistic to accomplish establishment records for 15 candidate Research Natural Areas during Forest Plan revision.

PC#: 204
Public Concern: The revised Forest Plan should define what is meant by the phrase, "Recreation in the area such as hiking, hunting, camping, and fishing will not be encouraged," in reference to Research Natural Areas.

Response: To "not encourage" certain recreational activities means the Research Natural Areas will not be indicated on recreation maps and designated campsites and trails will not be established in them.

PC#: 205
Public Concern: The Huron-Manistee National Forests should not attempt to "slide through" Research Natural Area designations as part of Forest Plans without disclosures and public involvement.

Response: The Research Natural Area designation process includes public involvement as described by the National Environmental Policy Act process. Site-specific decisions, which may be identified in Research Natural Area Management Plans, will follow all requirements for public notification and involvement.

Research Needs:

PC#: 206
Public Concern: There is no disclosure of Research needs and accomplishments made during the existing Plan period.

PC#: 207
Public Concern: What are the accomplishments and results of the Oak Administrative Study? How is the new information being applied to Plan Revision Management Direction? Is the Study being continued?

PC#: 208
Public Concern: What are the accomplishments and results of the Long Term Soil Productivity Study? How is the new information being applied to Plan Revision Management Direction? Is the Study being continued?

PC#: 209
Public Concern: Reference page A-20 of the Draft Plan document. What is the status of research being done for cedar regeneration? Is there any Management Direction to be applied of cedar other than "no cutting over the next 50 years"? Is more coordination needed with the Michigan Department of Natural Resources for deer management in regards to cedar on the Forests?

PC#: 210
Public Concern: Is the Forests' management still participating with Forest Service research in acid rain at the Pine River Research Forest lab? There needs to be a disclosure of the acid rain component on the Forests because of this monitoring. Is their any other air quality monitoring going on over the Forests?

Response: The Analysis of the Current Management Situation (September 18, 2003) identified two research needs for the Forests: 1) allowable sale quantity should be compatible with Ecological Land Type Phases; 2) ecological classification and inventory are used in management

prescriptions to meet vegetative community objectives. The research needs have not been completely addressed by the scientific community, to date. However, research in the area is on going and cooperative efforts among agencies are beginning to address statewide landscape planning on public lands. Additionally, the Forests have begun to incorporate concepts of Ecological Classification into the Planning process, for example, with respect to decisions regarding location and amount of barrens, prairie, and savannah restoration projects. Other research or administrative study results are generally addressed in the Forests' annual monitoring reports. Results or findings are incorporated into management practices on an ongoing basis.

The oak administrative study has been terminated and results are summarized in numerous documents. One of these, a peer reviewed publication (Williams 2003) used to guide management of low-site oak ecosystems on the Forests, is referenced in Appendix C of the revised Forest Plan.

Results of the Aspen replication of the Long Term Soil Productivity Study are published in several documents. The five-year results for the Huron-Manistee National Forest are summarized in a peer reviewed publication by Stone et al. (1998) (*see* Final Environmental Impact Statement, Chapter III). The ten-year results will be available sometime after October 2005. The 15th-year data collection has been initiated and the Huron-Manistee is scheduled for 2007-2008. Impacts of organic matter removal and compaction on soil productivity are addressed in the cumulative effects section of Chapter III, Final Environmental Impact Statement.

The management direction for northern white-cedar forest types from the original 1986 Forest Plan was carried forward with modifications into the revised Forest Plan. Cedar swamps will not be managed for timber, but may be modified for other needs. The Forests believe that adequate coordination exists between the Michigan Department of Natural Resources for deer and cedar management.

The Forests are still participating in the National Atmospheric Deposition Program. A site (MI53) is maintained in the Wellston area under private contract. Data collected from the site is available from the National Atmospheric Deposition Program website (http://nadp.sws.uiuc.edu/sites/sitemap.asp?state=mi). Over the last 20 years, the Forests have seen a gradual improvement in some air quality parameters related to acid rain. The Huron-Manistee National Forests are not aware of any other air quality monitoring being performed over the Forests.

Riparian Areas:

PC#: 211
Public Concern: The Forest Plan should coordinate with the Pine River Natural River Plan in regards to prohibiting roads, skid trails, and landing areas within Streamside Management Zones.

Response: The Huron-Manistee National Forests developed a management plan for the Pine River in 1995 with thorough public involvement. This plan predates the State of Michigan's Pine River Natural Rivers Plan. The revised Forest Plan follows the Forests' Pine River Management Plan in implementation of management activities.

The revised Forest Plan states in Section 2500, I, a, page II-17, that, "Vegetation management within the Streamside Management Zones will be consistent with the State of Michigan's Best Management Practices…" Certain management activities such as bank stabilization, endangered or threatened species viability concerns, and placement of large woody debris may require the use of equipment and may occur under the guidelines in the revised Forest Plan. A site-specific analysis is completed for each proposed project, involving the public and other local, State, and federal agencies, in which direct, indirect and cumulative effects are considered.

PC#: 212
Public Concern: The Forest Plan should contain guidelines that protect riparian areas from increasing recreational use.

Response: An edit has been made in the revised Forest Plan guideline 2500, I, A, 8, page II-21, to strengthen the intent. This guideline now reads, "Design management activities adjacent to lakes, streams, and wetlands to maintain stream bank and shoreline stability and riparian integrity."

PC#: 213
Public Concern: The Forest Plan, Standards and Guidelines on pages II-18 through II-22 should establish a minimum riparian buffer that limits disturbance (i.e., physical degradation, noise, air pollution) from Off-Highway Vehicle and snowmobile use.

Response: The revised Forest Plan already has protective recreation management guidelines that state that the location of motorized trails shall be 1,000 feet from streams and lakes wherever possible (revised Forest Plan, Chapter II, VIII, D, 3, page II-13.

PC#: 214
Public Concern: The Forest Plan should designate stream buffers that minimize habitat disturbance to adjacent uplands for the benefit of amphibians and reptiles, contributing to the protection of stream habitats.

Response: Because the size of a buffer area varies by species, it would be difficult to provide a universal buffer that would meet the need of all species. However, biodiversity was a major consideration in designing our designated old-growth areas. Approximately 1/3 of this design is made up of riparian areas and wetlands that, in turn, are connected to upland habitat. These areas are natural process areas where vegetation management activities are limited to providing for public health and safety, as well as ecosystem restoration by emulating natural disturbances. This, coupled with the use of Streamside Management Zones in other areas outside of the old-growth design, will provide for much the habitat needs of amphibians and reptiles on the Forests.

Road Density and Closure:

PC#: 215
Public Concern: The Huron-Manistee National Forests should reduce the density of roads because they disrupt wildlife and contribute to dumping of trash in the Forests. In some

instances, logging roads could be closed after harvesting. Some closed roads should have a short spur left open at the main road for recreationists to use for camping. A sign should be posted stating the reason for the closure.

Response: The revised Forest Plan, page II-5, provides direction to "Reduce the net miles of roads on the Forests by emphasizing the closures of roads determined to be non-essential for resource management." A roads analysis was done on the Huron-Manistee National Forests to determine road density. The results are discussed in the Final Environmental Impact Statement, page III-320. The revised Forest Plan sets road densities and states that when a road is not needed for administrative use or public needs that the road should be closed. Forest roads are not open to Off-Highway Vehicle use. Specific road closures are determined on a case-by-case basis following site-specific environmental analysis and public involvement.

The Huron-Manistee National Forests recognizes that trash dumping is a problem and the revised Forest Plan allows for road closures with site-specific analysis. The Final Environmental Impact Statement, Chapter III, beginning on pages III-322-3, identifies that a reduction of road miles may reduce littering and trash dumping. During the analysis for each timber sale, the question of closing roads is addressed. In most cases, roads are closed upon completion of timber harvest unless determined necessary for administrative purposes or other public uses, in which case, they will remain open. Potential impacts of timber sale roads are considered at a site-specific level, and as such, more analysis would occur at the project implementation level and disclosed during the environmental analysis process. In regards to leaving spurs for parking and camping, design and configuration of specific road closures are carried out on a case-by-case basis following site-specific environmental analysis and public involvement. Road closures and the effectiveness of the closures will be assessed on a case-by-case basis with public involvement. The type of signing used in specific road closures is also determined on a case-by-case basis.

PC#: 216
Public Concern: The Forest Plan, Table II-6 in Chapter II, page II-12 should indicate if the miles/square mile are minimums, averages or maximums. These miles seem unreasonably low in all cases for motorized and non-motorized uses.

Response: Table II-6 provides a guide that establishes the average range of miles per square mile within each management area. The guidelines were established in the 1986 Forest Plan. No information was brought forward during the Need for Change or Notice of Intent process that indicated changes were needed. There are locations were these guidelines are exceeded based on a site-specific analysis; however, our experience has been that in most cases these guidelines are valid for the respective management area objectives. The revised Forest Plan sets Management Area direction for 7.1 for highly concentrated recreational use, which does not specifically exclude motorized use.

PC#: 217
Public Concern: The Final Environmental Impact Statement should have contained maps of all roads and trails to facilitate meaningful input. This inhibited the public from engaging in meaningful analysis for proposed Wilderness designation, semiprimitive motorized and nonmotorized allocations, and road and trail density issues. The Council on Environmental

Quality implementing regulations state: "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion." Therefore, a revised environmental impact statement must be issued that includes maps of roads and trails.

Response: The Final Environmental Impact Statement and revised Forest Plan propose no specific road or trail construction or closure, such as, no site-specific decisions. It does establish Standards and Guidelines and Management Direction for all Management Areas, including Wilderness and semiprimitive areas. The planning record contains a copy of the transportation atlas that provides specific locations for all inventoried roads and trails. As part of the Huron-Manistee National Forests roads analysis process, site-specific National Environmental Policy Act documentation is prepared at the time of project level analysis and detailed information on existing roads and trails and proposed changes are part of these documents.

No site-specific decisions about roads and trails are being made. Therefore, adding the roads to our existing maps or providing additional maps displaying all inventoried roads is not necessary. Boundaries of existing and proposed Wilderness and semiprimitive areas are displayed on the maps provided with the draft and final documents. Additional detailed information about each of these areas is available in the planning record upon request.

The Council on Environmental Quality regulations does not require that detailed supporting information be included in the documents only that it be part of the planning record and available for public review. Our planning record contains this information.

PC#: 218
Public Concern: The Huron-Manistee National Forests should not reduce the net number of Forest Service road mileage. The Final Environmental Impact Statement should not have evaluated road densities by including state and county roads that the Forests have no control over.

Response: An estimated 10,400 miles of road exist within the Forests' boundaries, resulting in an average road density of 3.2 miles of road per square mile. Of the total miles, approximately 6,670 miles are state and county roads. This figure does not include unclassified or user-developed roads. The analysis properly considered state and county roads because of the cumulative effects that they have on the forests. More than 90 percent of National Forest System lands within the Huron-Manistee National Forests are located within ¼ mile of a road. (Final Environmental Impact Statement, page III-320).

All three alternatives provide for restoration activities for a variety of wildlife species and habitats, with Alternatives B and C proposing an increase in these activities. In order to most effectively restore and conserve wildlife and plant species and habitats, roads may be obliterated in order to restore habitat, roads may be closed to public vehicular use, or roads may be restricted by vehicle type or season of use. Additional roads could be developed. These determinations will be made only after site-specific analysis. An ample amount of access would continue to be provided across the Forests for management purposes, recreational activities, and public use.

The revised Forest Plan, page II-5, provides direction to "Reduce the net miles of roads on the Forests by emphasizing the closures of roads determined to be non-essential for resource management." The revised Forest Plan sets road densities and states that when a road is not needed for administrative use or public needs that the road should be closed. Specific road closures are carried out on a case-by-case basis following site-specific environmental analysis and public involvement.

PC#: 219
Public Concern: The Forest Plan should contain road closure Standards and Guidelines in the Management Area Direction. Scenery Management System should be addressed in the Forests Plan in the appropriate Management Area.

Response: Road closures may be necessary to implement under a tremendous variety of circumstances and the revised Forest Plan must be flexible enough to allow project managers to adapt appropriately. Therefore, the specific method used to close any given road is not a revised Forest Plan level issue but rather an implementation issue to be decided on a case-by-case basis at the site-specific level. The Huron-Manistee National Forests have a large body of literature to draw from when making decisions on how to implement specific road closures; see, for example, A Guide to Road Closure and Obliteration in the Forest Service (Moll 1996).

PC#: 220
Public Concern: The Huron-Manistee National Forests should provide for motorized and nonmotorized recreation in other, noncompeting locations when existing recreational use is displaced because of closures. Conflicts between users can be avoiding with proper planning.

Response: The revised Forest Plan states at II-6: "Design and manage trails for a primary seasonal use, to discourage conflicting uses. Prevent motorized and nonmotorized uses from occurring at the same time during any season of the year. Trails may also have secondary uses." The revised Forest Plan allows for the creation of additional trails except in Management Areas 7.1 and 8.2, upon completion of a site-specific analysis.

Semiprimitive Motorized Management Areas:

PC#: 221
Public Concern: The Forest Plan should increase 6.2 semiprimitive motorized Management Areas over 6.1 semiprimitive nonmotorized Management Areas because semiprimitive motorized is enjoyed by the majority of forest users.

Additionally, other re-designations that should occur are semiprimitive nonmotorized and semiprimitive motorized Management Areas to 2.1, 4.2, or 4.3. Specifically, White River, Whalen Lake, and Condon West semiprimitive nonmotorized should be re-designated to 4.2 or 6.2 MAs; Briar Hills (south) should be a 2.1 MA; Loda Lake and Nordhouse (eastern portion) should be re-designated as a 4.2 or 4.3.

Response: The Huron-Manistee National Forests are managed in accordance with the Multiple-Use Sustained-Yield Act of 1960. The Forests have been divided into Management Areas, each

providing a different mix of opportunities and outputs. One of the recreation opportunities requested and provided for in these Management Areas is a non-motorized experience. As part of the current Forest Plan revision process, the forest reviewed all management area designations based on regional and national guidelines. Recommendations were made to change management area designations. These recommendations are reflected in the three alternatives and the potential impacts are disclosed in the Final Environmental Impact Statement, pages III-300 through 307. Depending on the alternative, some areas may be closed to motorized recreation. The Forests retain motorized recreation opportunities in all Alternatives. Motorized recreation opportunities exist both outside and within semiprimitive motorized areas. Semiprimitive nonmotorized recreation opportunities are limited to the high density of roads on the Forests. Because of the relatively limited opportunity for nonmotorized recreation, the Forests have provided more acres of semiprimitive nonmotorized Management Areas compared to semiprimitive motorized in all alternatives.

The Final Environmental Impact Statement, page 314, indicated that some motorized recreation activities have continued to occur in or near several existing semiprimitive nonmotorized management areas. For example, snowmobile trails cross the Briar Hills semiprimitive nonmotorized Management Areas. Most of these trails are located on county roads within the areas where the Forest Service does not have jurisdiction over motorized use in the road rights of way. In the Selected Alternative, management of the Briar Hills South area was recommended to be changed to semiprimitive motorized to recognize these existing snowmobile and motorcycle trails while retaining semiprimitive values.

Management of the Loda Lake area was changed from 4.2 to 1.1 in Amendment #24 (March 2003). Semiprimitive motorized Areas in the revised Forest Plan are now 6.2, which includes Loda Lake. The designation changes were made to facilitate efficient administration and management. The desired future condition for Loda Lake area is to provide habitat for the Karner blue butterfly and a variety of recreational opportunities, for hunting, camping, driving for pleasure, gathering forest products, hiking, mountain biking and Off-Highway Vehicle use.

Much of the Nordhouse area was heavily roaded and used for motorized recreational purposes. In addition, a paved and heavily used access road occurred within the southern portion of the 1986 Management Area. Accordingly, the Forest changed the configuration of the Management Area such that the northern portions of the Management Area became Roaded Natural Sandy Plains and Hills (4.2) and Roaded Natural Wetlands (4.3) Grouse Emphasis Areas. The remaining, central portions, of the Management Area remained semiprimitive motorized (6.2) as it was determined that objectives of that Management Area were attainable and that the Management Area would contribute to the diversity of recreational opportunities the Forests must provide.

Semiprimitive Nonmotorized Management Areas:

PC#: 222
Public Concern: The Forest Plan should not designate deer or grouse emphasis areas semiprimitive areas. Semiprimitive motorized and semiprimitive nonmotorized areas are

supposed to be "characterized by a predominantly natural appearing environment of moderate to large size." (Draft Environmental Impact Statement, page J-43).

Response: The Recreation Opportunity Spectrum is a system of classifying the range of recreational experiences, opportunities, and settings available in a given area of land. For example, primitive areas are characterized by an essentially unmodified environment. Semiprimitive non-motorized is characterized by few and/or subtle human modifications and Semi-primitive Motorized is characterized by moderately dominant human alterations (Final Environmental Impact Statement, Appendix J, page J-36). Semi-primitive areas are, "characterized by a predominantly natural appearing environment of moderate to large size." The Glossary goes on to say that, "The area is managed in such a way that minimum on-site controls and restrictions may be present, but would be subtle". Naturally appearing is described as "the existing natural character of the landscape is integrated into management activities such as harvesting. The landscape shows few signs of forest management; however the effects of naturally occurring disturbances, such as fire or windstorm, may be noticeable." These characteristics describe the recreational experience specifically, and do not preclude management. Brandybrook Deer Emphasis Area (Management Area 6.2D) is the only semiprimitive area managed to provide browse for deer. There are no grouse emphasis areas in Management Areas 6.1 or 6.2. Aspen is a naturally occurring component of these areas and occurs because of natural disturbances (windthrow) and because of timber harvest.

PC#: 223
Public Concern: The Forest Plan should increase semiprimitive nonmotorized areas because such areas are rare in the Midwest and the Forests are being overrun by Off-Highway Vehicles causing damage, noise, and new cross-country trails are being created.

Response: The Forests evaluated a range of alternatives in the Final Environmental Impact Statement including two alternatives that increase semiprimitive nonmotorized Management Areas compared to current levels. As part of the Forest Plan revision process, the Forests reviewed all Management Area designations based on Regional and National guidelines. Recommendations were made to change Management Area designations. These recommendations are reflected in the three alternatives. Public comment received prior to the completion of the Need for Change and Notice of Intent (September 2003) identified the need for semiprimitive motorized and Nonmotorized areas. The Selected Alternative identifies more semi-primitive area acreage than the 1986 Forest Plan. The Management Area describes a Desired Future Condition. In some cases, the desired future condition is achieved quickly; in other cases, it may take more time and effort. Semiprimitive nonmotorized areas in the Lower Peninsula of Michigan, because of limited federal ownership, ownership patterns, development within forest boundaries and jurisdiction over existing roads, may not meet expectations of the Recreation Opportunity Spectrum guide for individual recreational experiences. To provide the range of opportunities for visitors in Northern Michigan, the Forests accept that some areas are "aspiring" to meet the desired future condition. Motorized recreation is only permitted on designated roads and trails. The network of roads is available to street legal vehicles; other motorized uses are permitted only on designated portions of the road network. Table III-34 on page III-300 in the Final Environmental Impact Statement accurately depicts what it is intended to communicate, such as, the number of miles of trails, not roads, available to motorized use.

Existing road miles are documented in Table III-44 in the Final Environmental Impact Statement. The potential impacts of semiprimitive Management Areas were analyzed and disclosed in the Final Environmental Impact Statement, pages III-313 through 319. Based on the analysis, it was determined that the Selected Alternative maximizes net public benefits, remains consistent with resource integration and management requirements, and complies with the long-term goals and objectives as outlined in the revised Forest Plan. Ecological, economic, and social considerations are balanced within environmental laws, regulations, and policies.

PC#: 224
Public Concern: The Forest Plan should close semiprimitive Management Areas to hunting, including 5.1, 6.1, 8.1, 8.2, 9.1, and 9.2 areas, wildlife emphasis areas, and within one-mile of these areas.

Response: The State of Michigan possesses the authority for game management and the hunting of game. As stated in Forest Service Manual 2643.1, "Hunting, fishing, and trapping of fish and wildlife and associated practices on National Forest System lands are subject to State fish and wildlife laws and regulations. The exceptions include: 1) state fish and wildlife laws and regulations that conflict with Federal laws; or 2) state laws and regulations would permit activities that conflict with land and resource management responsibilities of the Forest Service or that are inconsistent with direction in forest plans."

The basis for the above policy is the Multiple-Use Sustained-Yield Act of 1960. Although this Act states that one of the purposes for management of National Forests includes wildlife and fish, the Act also states that "[nothing herein shall be construed as affecting the jurisdiction of responsibilities of the several States with respect to wildlife and fish on the national forests." In addition, the Federal Land Policy and Management Act provides "nothing in this Act shall be construed as authorizing the Secretary concerned to require Federal permits to hunt and fish …on lands in the National Forest System or as enlarging or diminishing the responsibility and authority of the States for management of fish and resident wildlife." The Federal Land Policy and Management Act further states that, "except in emergencies, any regulations of the Secretary concerned relating to hunting and fishing pursuant to this section shall be put into effect only after consultation with the appropriate State fish and game department." (43U.S.C. 1732(b)).

The Forest Service does have the authority to issue closure orders for specific areas related to,

- public health and safety - 36 C.F.R. 261.53(e)
- discharging a firearm, air rifle, or gas gun - 36 C.F.R. 261.58(m)
- Possessing any animal or parts, etc. - 36 C.F.R. 261.58(t)
- hunting or fishing - 36 C.F.R. 261.58(v)

The Forest Service does possess the authority to issue closures as necessary to accomplish certain purposes, for example, to provide safe areas around campgrounds, or to provide protection for endangered species such as the Kirtland's warbler. However, the Forest's determined that a general closure based solely on the regulation of hunting and fishing, or sights and sounds associated with those activities, is not justifiable given the aforementioned laws and policies.

PC#: 225

Public Concern: The Huron-Manistee National Forests should reevaluate semiprimitive Management Areas (Motorized and Nonmotorized) because current uses and conditions are not compatible with their semiprimitive category.

Specifically, point-by-point:

1) Motorized user groups were not party to the settlement agreement;
2) There exists no demonstrated need for semiprimitive nonmotorized;
2a) Current conditions and uses are not conducive to semiprimitive nonmotorized values
3) Au Sable electric transmission line, private ownership access, mineral ownership, motored watercraft;
4) Cooke Dam has motorized watercraft on impoundments, proximity to high use areas, swampy conditions;
5) Hoist and Reed Lakes: should allow bicycles - management direction says more opportunities will be provided;
6) S Branch Au Sable: What is status of FR 4212 near Mason Chapel?;
7) Whitewater Creek:50percent private ownership, no subsurface ownership, power line row, ATV, motorcycle and snowmobile trails adjacent to south boundary and through eastern portion;
8) Briar Hills (north): majority not in favor of action alternatives, do not have attribute of semiprimitive nonmotorized, Forest Service did not disclose true character of the Management Areas on recreation and quad maps re: classified roads;
9) Condon Lakes West: relocate North Country Trail to this area, vegetative management, and public may object to limiting access;
10) Manistee River: western road heavily used and is snowmobile trail, heavy use for drive in rustic camping, motors allowed on river, Area doesn't have attributes of semiprimitive nonmotorized, relocate North Country Trail to east side of river from Red Bridge to Hodenpyle to allow bikes on west side trail, allow motorized access to old Red Bridge lookout tower site;
11) Whalen Lake (Big South): heavily roaded, rural area, heavily infested with invasives, pine plantations need thinning, location not conducive to semiprimitive nonmotorized; recreation maps don't show many county roads within boundary, minor signs of dumping and civil disobedience, research natural area criteria can't be met in this area or Bear Swamp.
12) Wakeley Lake: We agree with the – Summary of Recreation Opportunity Spectrum Assessment 9/18/03 – “Change from semiprimitive nonmotorized and roaded natural to rural since the majority of the area is private and being developed”; also the proximity of the airport to the Lake.
13) White River: The Recreation Opportunity Spectrum inventory of this area is Roaded Natural. Currently this area is heavily roaded; located in an area that is very developed; area is limited by county roads and utilities; located in a rural area, not conductive to semiprimitive nonmotorized attributes. Present condition; no trails currently exists; 6 miles of county maintained roads throughout area, and 10 miles level 2 roads; USGS special use permit road; heavy camping use occurs along the rivers; allow outboard motors on the river...The Recreation Opportunity Spectrum of this area should be returned to Roaded Natural in light of above facts, also it seems logical in light of the above stated conditions this area would not be suitable for any Research Natural Area designation or further study in that direction.

Response: The Huron-Manistee National Forests recognize that portions of semiprimitive motorized and semiprimitive nonmotorized Management Areas do not provide the semiprimitive experience as envisioned in the revised Forest Plan. Despite the fact that the desired future conditions for semiprimitive motorized and semiprimitive nonmotorized values may not be present, management will continue until these conditions are achieved. The Huron-Manistee National Forests believe that these areas represent the best opportunity for the Forests to achieve the desired results.

1. As part of the current Forest Plan revision process, the Forests reviewed all Management Area designations based on regional and national guidelines. Based on this analysis, recommendations were made to change Management Area designations. These recommendations are reflected in the three alternatives.
2. Public Comment received during the Need for Change and Notice of Intent identified the need for semi-primitive motorized and non-motorized areas. Public involvement in the development of the alternatives was not limited to those parties involved in the Settlement Agreement on the 1986 Forest Plan, but was open to everyone.

2a. The Management Area describes a desired future condition. In some cases, we will achieve that desired future condition quickly; in other cases, it may take more time and effort. Semiprimitive nonmotorized areas in the Lower Peninsula, because of limited federal ownership, ownership pattern, development within forest boundaries and jurisdiction over existing roads, may not meet expectations of the Recreation Opportunity Spectrum guide for individual recreational experiences. To provide the range of opportunities for visitors in northern Michigan, the Forests accept that some areas are "aspiring" to meet the desired future condition and will be managed to move towards that desired future condition as opportunities arise.

3. Au Sable: See general statement 2a. Thank you for your comment. The Forests recognizes the existence of the transmission lines and state-owned mineral rights.
4. Cooke: The presence of motorized watercraft is transitory, similar to aircraft. We would not expect motorized watercraft to have a significant effect on the visitor's experience level
5. Hoist and Reid: There have been no proposals to develop mountain bike trails in these areas. Management direction allows for increased opportunities by allowing mountain bikes on all Forest Service roads unless closed by Forest Supervisor's order (revised Forest Plan, Chapter II, VIII, A, 8, page II-12).
6. S. Branch Au Sable: FR4212 will remain open (revised Forest Plan, Chapter III, 2300, II, A, 5, page III-6.1-5.
7. Whitewater Creek: See general comment 2a above.
8. Briar Hills: This decision was made through a site-specific analysis following Forest Plan direction (revised Forest Plan, Chapter III, page III-6.1-3, Table III-8).
9. Condon Lakes West: The current location of the North Country National Scenic Trail takes advantage of the area's natural attributes. There is no demonstrated need to relocate this trail. Vegetation Management may be used to meet the objectives of old growth designation and semi-primitive designation. There is currently limited access because of a large expanse of wetlands.

10. Manistee River: See general statement at 2a. Relocation of the North Country National Scenic Trail and status of motorized access to Old Red Bridge lookout site are site-specific projects, which are not addressed at Forest Plan level.
11. Whalen Lake: It is recognized that portions of the Whalen Lake (Big South) area do not currently provide a semiprimitive experience as envisioned in the Forest Plan. Although the desired future conditions for semiprimitive nonmotorized may not currently be present in all portions of the Big South semiprimitive nonmotorized, management will continue until semiprimitive nonmotorized conditions are achieved. In regards to Big South and Bear Swamp research natural area designation, some of the ecological communities represented within these areas have been altered by past and current land uses and management activities. However, portions of both of these areas remain relatively intact and serve as quality examples for representation into the research natural area program. Forest Service Manual direction (4063.2) states, "In the selection of representative areas a pristine condition is the goal. However, when candidate areas in a pristine condition are unavailable, then areas that reflect the pristine condition as closely as possible may be selected." Designating research natural areas helps protect and maintain representative landscapes within National Forest boundaries so that natural processes can function and be studied. Research natural areas can also provide baseline information to evaluate the effects of management on similar ecosystems, per National Forest Management Act requirements. The rationale for selecting these particular areas to represent ecological communities on the Forests is explained in detail in the report entitled "*An Evaluation of Candidate and Potential Candidate Research Natural Areas on the Huron-Manistee National Forest with a Focus on Ecosystem Representation"*, referenced in Appendix C of the Final Environmental Impact Statement. This report describes the 20-year history of rare and representative surveys conducted on the Forests and the process used to select which of those communities to recommend for candidate research natural area status. Appendix C of the Final Environmental Impact Statement further explains how the Forests utilized information from the above-referenced report to make final recommendations for the revised Forest Plan. Recreational use may be allowed in research natural areas as long as the use does not degrade the special values for which the research natural area was established. Public information or signage may be distributed or displayed to gain public support and awareness of the research natural areas values. The comment appears to refer to the Forest Visitor Maps, which will be updated within the next few years. Current editions were published prior to 1996.
12. The quote from the Summary of Recreation Opportunity Spectrum Assessment applies to the area south of M-72. The area south of M-72 will be managed as rural as stated in the Summary of Recreation Opportunity Spectrum Assessment.
13. The White River semiprimitive Area is a large block of public ownership bounded on three sides by the White River. There are only a few private inholdings, with the majority of them found along the area's perimeter. A site-specific analysis for the management of this area has been completed. Over the last several years, the Forest Service has been closing roads and restoring areas impacted by unmanaged camping and illegal Off-Highway Vehicle use. This management will continue over the next several years until the Desired Future Condition is achieved.

PC#: 226
Public Concern: The Forest Plan should not allow snowmobiles in semiprimitive nonmotorized Management Areas because snowmobiling destroys isolation from the sights and sound of humans in semiprimitive nonmotorized areas.

Response: The Huron-Manistee National Forests, in accordance with the Multiple-Use Sustained-Yield Act of 1960, are managed to provide a wide range of products and recreational opportunities. The need to provide the opportunity for visitors to experience solitude and little interaction with the sights and sounds of other humans is recognized and incorporated into the revised Forest Plan. This goal is incorporated into the Standards and Guidelines for Management Areas 6.1, semiprimitive nonmotorized and 5.1 Wilderness. Snowmobiles are not allowed in the Forests' wilderness area. Although most of the Forests semiprimitive nonmotorized areas currently have some degree of motorized use occurring within them, ultimately the desired future condition of these areas is to provide users with the opportunity to experience a "semiprimitive nonmotorized recreation experience."

PC#: 227
Public Concern: The Huron-Manistee National Forests should designate Loda Lake and Brandy Brook as semiprimitive nonmotorized Management Areas and Brandy Brook area should not be managed as a Deer Emphasis Area because of the negative impact deer browsing will have on the candidate Research Natural Area.

Response: The Final Environmental Impact Statement analyzed a variety of alternatives to address Forest Plan Revision issues, including one that evaluated designating Loda Lake semiprimitive motorized and Brandy Brook semiprimitive motorized Areas as semiprimitive nonmotorized areas. The effects of semiprimitive areas are disclosed in the Final Environmental Impact Statement starting on pages III-313 through 319. Each alternative meets the intent of relevant laws under which the National Forests are managed. The Regional Forester considered all of the alternatives and the Record of Decision describes his rational for the Selected Alternative. The Selected Alternative represents what forest managers believe to be the best balance in achieving sustainable ecosystems and meeting the intent of relevant laws, and addressing the issues and concerns specific to the Huron-Manistee National Forests.

The Huron-Manistee National Forests recognize that adverse impacts on vegetation associated with browsing by white-tailed deer are, at least locally, significant. Associated impacts are disclosed in the Final Environmental Impact Statement at various locations. There is no evidence to suggest that concentrations of deer associated with the deer emphasis area adjacent to the Research Natural Area would exacerbate deer impacts above current levels. However, we acknowledge that the possibility exits. When developing the Brandy Brook Research Natural Area management plan we will look for opportunities to mitigate negative impacts.

PC#: 228
Public Concern: The Final Environmental Impact Statement should disclose how recreationists will gain access to activities on the Au Sable River.

Response: There are a number of access sites to the Au Sable semiprimitive nonmotorized area that are available to the public. Consumer's Energy, tail-water access below Alcona Dam Pond, Bobcat Creek, Thompson's Landing, Loud Dam pond and Rollways Picnic area all provide access to the Au Sable. Although, the current revised Forest Plan allowed limited vehicular access to the east and west of the river, these were to be temporary in nature, approximately 10 years. Implementation of the 1986 Forest Plan closed these remaining two roads over the past five years. Although gated and closed, pedestrian access is still permitted, as well as other non-motorized uses within the area, such as use of the Shore-to-Shore Hiking and Horse trail. Since this area is being managed as a semiprimitive nonmotorized area, all-vehicular access within the area is prohibited except for private landowners under permit for access to their properties. Remote and/or dispersed camping is allowed as part of the Au Sable primitive camping system.

PC#: 229
Public Concern: The Final Environmental Impact Statement alternatives maps should depict 6.2 semiprimitive nonmotorized Management Areas the same, as 6.2 semiprimitive nonmotorized Management Areas. The 2002 Roads Analysis Map is unclear as to the reason for changing Management Areas 2.1 to 4.3 and 8.1 to 4.3. Lumping all semiprimitive nonmotorized areas in one area is not agreeable.

Response: In the 1986 Forest Plan, represented by Alternative A in the Forest Plan revision process, Management Areas 6.1, 6.2, and 6.3 were all semiprimitive nonmotorized areas in different land type associations. In Alternatives B and C, semiprimitive nonmotorized areas are consolidated into management area 6.1. The Huron-Manistee National Forests has been divided into Management Areas, each providing a different mix of opportunities and outputs. As part of the Forest Plan revision process, the Forests reviewed all Management Area designations. Based on changes that have occurred during implementation of the current Plan, such as demographic changes, subdivisions and development of private lands, modifications were made to some area boundaries and designations. The area around Walgamott Corners was incorporated into the surrounding 4.3 area because it has similar characteristics. Walkinshaw Wetlands was originally designated 4.3 and changed to 8.1. Because of changes in Regional direction and reconsideration of the current management situation, Walkinshaw Wetlands was changed back to 4.3. Changes in the Walkinshaw Wetlands' management area designation do not change our direction for this area (revised Forest Plan, Chapter III, beginning on page III-4.3-1.

PC#: 230
Public Concern: The Forest Plan should maintain Briar Hills intact as a semiprimitive nonmotorized Management Area because the Forests need more roadless areas.

Response: The Forests are managed in accordance with the Multiple-Use Sustained-Yield Act of 1960. The Forests have been divided into Management Areas, each providing a different mix of opportunities and outputs. A variety of recreational opportunities are provided, including motorized recreation. As part of the Forest Plan revision process, the Forests reviewed Management Area designations based on Regional and National guidelines. Because of the roadless/wilderness evaluations, additional areas were identified for consideration as semiprimitive nonmotorized. Recommendations were then made to change Management Area designations. The recommendations are reflected in the three alternatives; therefore, some areas

may be closed to motorized recreation. The Forests do retain nonmotorized recreation opportunities in all Alternatives. The Huron-Manistee National Forests evaluated Alternative C, which designated additional acres of semiprimitive nonmotorized management areas. Included in this range of Alternatives was one that maintained the Briar Hills South area as semiprimitive nonmotorized, Alternative A, and an alternative where *all* semiprimitive areas were changed to nonmotorized, Alternative C. Each Alternative met the intent of relevant laws, including the Multiple-Use Sustained-Yield Act of 1960, under which the National Forests are managed. The Regional Forester considered all of the Alternatives and the Record of Decision describes his rationale for the Selected Alternative. The Selected Alternative represents what the Forests believe to be the best balance in achieving sustainable ecosystems, meeting the intent of relevant laws, and addressing the issues and concerns specific to the Huron-Manistee National Forests.

Soils:

PC#: 231
Public Concern: The Huron-Manistee National Forests should stop whole tree chipping because it takes too much from the soil. Tree tops need to be left on-site to help build the soil up.

Response: Impacts of organic matter removal and compaction are addressed in the cumulative effects section, Chapter III, of the Final Environmental Impact Statement. The determination in the effects analysis was that, though, there may be short-term losses in soil productivity from biomass removals, long-term site productivity would be maintained under all alternatives in accordance with federal regulation and revised Forest Plan Standards and Guidelines.

Special Uses:

PC#: 232
Public Concern: The Forest Plan should be corrected under the various Management Area Direction sections, 2700 Special Use Management where it states that there are 10 hydro-electric projects licensed by the Federal Energy Regulatory Commission, as it pertains to the Croton and Hardy dams which do not have National Forest System lands as part of their projects.

Response: We agree with the comment and appreciate pointing out the correct number of Federal Energy Regulatory Commission licensed projects that have applicable 4(e) conditions, eight, rather than ten.

The 4(e) terms and conditions are incorporated into the Standards and Guidelines by reference.

PC#: 233
Public Concern: The Huron-Manistee National Forests should deny permission to private clubs to hold Off-Highway Vehicle and automobile races and rallies on National Forest System land because it is damaging to forest values. The revised Forest Plan should explain use of the terms, “where possible,” “where appropriate,” and “competitive” and explain who will decide what is possible and appropriate.

Response: The administration of special use permits is done under regulations and policy found in the in Forest Service Handbook, 2709.11. The Forests must follow agency direction in administering and issuing permits. Changing these procedures is a national issue and outside the scope of the Forest Plan revision process. Decisions on permitting specific special use events are made on a case-by-case basis following site-specific environmental analysis and public involvement. The term "competitive" is used in its common meaning. Forest Service regulations do not prohibit competitive events on National Forest System lands. However, competitive events and the determination of "where possible" and "where appropriate" is a site-specific determination made by the Line Officer after the completion of an environmental analysis, including public involvement.

Streamside Management Zone:

PC#: 234
Public Concern: The Huron-Manistee National Forests should clarify the amount of riparian vegetation that can potentially be managed for early-successional habitat. This should include the amount within the Streamside Management Zone and the amount that can be managed for this habitat type within the riparian corridor that extends beyond the Streamside Management Zone. Species requiring early-successional habitat in riparian zones should be identified. Further, there should be a guideline for what is an adequate amount of early-successional habitat and what will be the standard used to determine this amount.

Response: The Species Viability Evaluation process is summarized on pages B-13 to B-15, in Appendix B of the Final Environmental Impact Statement. The process was used to determine conservation measures necessary to provide for species with viability concerns on the Forests. Species requiring early-successional habitat in riparian zones are identified in Table B-3 of this Appendix. The species are organized into habitat groups and each habitat group is identified by a surrogate species. Habitat groups requiring early successional habitat in riparian zones are shrub/scrub wetlands, golden-winged warbler surrogate species, and riparian/lowland hardwoods/floodplain/early to mid successional habitat, eastern massasauga surrogate species. Conservation measures developed for these habitat groups are discussed in the Analysis of the Current Management Situation (9/18/2003).

The Species Viability Evaluation process identified 5,000 acres, or 2,500 per National Forest, of early successional shrub/scrub habitats that would be maintained or enhanced within the riparian corridor areas, by either natural processes or management, with adequate distribution across the Forests to provide for viable populations.

Managing for early successional habitat to address this need within riparian corridors will be addressed on a case-by-case basis under site-specific environmental documentation with public involvement. Key factors that will need to be considered at the site level include natural disturbance processes, habitat needs of riparian-dependent endangered, threatened, and sensitive species, and the amount of existing and foreseeable future habitat on National Forest System lands. The habitat does not necessarily have to be created or maintained within the Streamside Management Zone. The habitat may be provided for within riparian areas, but outside the Streamside Management Zone. However, active management for early successional habitat

within the Streamside Management Zone may occur if it is demonstrated that the habitat need cannot be met elsewhere. Additional factors are identified in Chapter II of the revised Forest Plan Standards and Guidelines.

There is no specific number of acres that may be managed for early successional habitat within the riparian corridor adjacent to Streamside Management Zones. Management within riparian corridors outside Streamside Management Zones is subject to the following objectives and guidelines:

- Manage riparian areas consistent with resource conditions, management objectives and designated water use. Reduce nonpoint pollution to the maximum extent feasible and protect the hydrologic function of watersheds.

- Management activities are allowed in wetland areas when they will not cause a detrimental change to the soil characteristics or hydrologic function of the wetland areas.

Finally, the revised Forest Plan is implemented at the project level under site-specific environmental documentation with public involvement. The revised Forest Plan must allow sufficient flexibility, such that Line Officers can use appropriate evaluation methods based on specific circumstances encountered on a case-by-case basis. The Huron-Manistee National Forests believe that a guideline specifying a standard methodology for determining the amount of habitat available would compromise this important flexibility. The amount of early successional habitat in Streamside Management Zones is stated in the Final Environmental Impact Statement, and is not necessary to incorporate into the revised Forest Plan as a guideline.

PC#: 235
Public Concern: The Huron-Manistee National Forests should not manage early successional habitat in streamside and riparian areas.

PC#: 236
Public Concern: The Final Environmental Impact Statement should not ignore negative impact on water quality through sediment delivery and increased water temperatures.

PC#: 237
Public Concern: The Final Environmental Impact Statement analysis ignores negative impact this would have on most reptile and amphibian populations.

PC#: 238
Public Concern: Analysis ignores impact this would have on riparian cedar and hemlock forest (which has declined almost 75 percent since the last Forest Plan) through blowdowns and changing ground water.

Response: In general, riparian corridors are managed for late seral stages (revised Forest Plan Chapter II). However, the revised Forest Plan allows for active management for early successional habitat to maintain species viability within the Streamside Management Zone for endangered, threatened, and sensitive species where natural disturbance processes are not

providing adequate habitat on a case-by-case basis. Five thousand acres, or 2,500 per National Forest, of the riparian corridor can be managed for this purpose.

If early successional habitat management is to occur, Best Management Practices (BMPs) will be employed, per revised Forest Plan Standards and Guidelines (Final Environmental Impact Statement, Chapter III, page III-22). The 6th level watershed will be used as the unit of analysis in determining the need for active early successional habitat management in the riparian corridor.

The Species Viability Evaluation analysis (Appendix B, Final Environmental Impact Statement) and the Final Environmental Impact Statement did consider riparian associated species. Conservation measures for reptile species identified in the Species Viability Evaluation process will provide protection (see Species Viability Evaluation in the Analysis of the Management Situation, September 18, 2003). In addition, biodiversity was a major consideration in identifying our designated old growth areas. Approximately one-third of this design is made up of riparian areas and wetlands that, in turn, are connected to upland habitat. These areas are natural process areas where vegetation management activities are limited to providing for public health and safety as well as ecosystem restoration by emulating natural disturbances.

The Forests do not believe that implementation of the revised Forest Plan will have a negative effect on water quality and sediment delivery. As stated in the revised Forest Plan (Chapter II, Standards and Guidelines), the Forests will implement the State of Michigan Best Management Practices to protect water quality and prevent sedimentation as described in the Final Environmental Impact Statement.

Conservation measures identified in the Species Viability Evaluation analysis for the cedar swamp and conifer-hardwood habitat types will provide some protection for northern white cedar and hemlock (Final Environmental Impact Statement, Appendix B). Chapter III of the Final Environmental Impact Statement, Affected Environment and Environmental Consequences, also addresses the effects on these forest types. In addition, those cedar and hemlock found in old growth areas will also be protected. There are no plans to harvest cedar or hemlock on National Forest System lands.

PC#: 239
Public Concern: We see habitat value in Streamside Management Zone. There should be a minimum percentage of this desirable habitat. Total early-successional habitat is not to exceed 66 percent of the area within any 6th level watershed - a minimum percent is probably a more important and useful figure to guide management, as there seems to be a danger that the minimum is far more likely to be approached than the maximum.

Response: The Species Viability Evaluations assessed the minimum habitat requirements to maintain viability of native and desirable non-native species (Final Environmental Impact Statement, Appendix B). The 66 percent area within any sixth level watershed is a threshold level, as opposed to a maximum. In other words, when this level is reached, or exceeded, over-land flow from precipitation events will cause an increase in channel-forming flows (Final Environmental Impact Statement, Chapter III Water Quality).

PC#: 240
Public Concern: The Huron-Manistee National Forests should give watershed protection and proper management a high-priority in management planning. This should not only include heightened protection for Wild and Scenic Rivers, Michigan Natural Rivers and blue Ribbon Trout Streams, but also for the tributaries, intermittent streams, springs, wetlands and forested wetlands that are part of these ecosystems. Little value was placed on headwaters of these areas in the Forest Plans.

Response: The revised Forest Plan Standards and Guidelines (Chapter II) offer protection for all aquatic and riparian habitats within a watershed, including important headwater areas.

PC#: 241
Public Concern: The Huron-Manistee National Forests should adhere to Best Management Practices, such as those in Water Quality Management Practices on Forest Land (Michigan Department of Natural Resources, 1994) when working in the Streamside Management Zone or in those instances where some sort of mechanical treatment is proposed to mange riparian vegetation. Consider referencing the practices in the "Guidelines" section.

Response: The revised Forest Plan Standards and Guidelines identified section 2500 Watershed Management, I.A.5-6, were designed specifically to protect water quality and address potential impacts that could result from various forest management practices. All alternatives require the use of the Michigan Department of Natural Resources best management practices (Michigan Department of Natural Resources 1994) to mitigate potential negative effects on water quality (Final Environmental Impact Statement, page III-20; revised Forest Plan II-21, 2500 Standards and Guidelines). Best management practices are an integral part of our management strategies and are incorporated into all management practices. Analysis of potential impacts to resources, resulting from applying these Standards and Guidelines, are provided in the Final Environmental Impact Statement, pages III-18 to III-24. This analysis indicated no adverse impacts are expected to result.

PC#: 242
Public Concern: The Huron-Manistee National Forests should maintain a 300-foot wide riparian buffer during vegetative management adjacent to trout streams where possible, with case-by-case exceptions as necessary.

PC#: 243
Public Concern: The Huron-Manistee National Forests should maintain a minimum buffer strip width for Riparian Corridors of 100 feet, from each side of a stream, measured from the bank of the lake or stream. Strip width should be increased with increase in slope percent.

Response: The revised Forest Plan has addressed the issue of riparian buffer width with guidelines and best management practices to protect water quality and riparian integrity, Chapter II, 2500, pages II-17 to II-22. In general, these call for a 100-foot Streamside Management Zone. Late seral conditions are emphasized in this area and special precautionary management restrictions apply. The zone extends in distance as on site slope increases up to slopes greater than 50 percent. After slopes become that steep, management is not recommended. This

management system is consistent with that used by the State of Michigan Department of Natural Resources and recommended by the Department of Environmental Quality.

Application of Streamside Management Zones, in combination with other Standards and Guidelines aimed at protecting aquatic resources, are evaluated in the Environmental Impact Statement. No adverse direct or indirect effects are expected to occur to trout streams or other water bodies because of implementing the revised Forest Plan (Chapter III-20 Water Quality, Affected Environment, and Environmental Consequences)

PC#: 244
Public Concern: The Forest Plan Streamside Management Zones should not supercede those required in Michigan's Natural Rivers / Wild and Scenic River legislation because managing for early successional vegetation within 100 feet of rivers is in conflict. The plan should give the definition of sensitive wildlife species.

Response: The National Wild and Scenic Rivers Act does not preclude vegetation management within the riparian corridor. However, the revised Forest Plan desired future conditions for riparian areas are similar to those in the State Natural River Management Plan. Generally, riparian areas including the Streamside Management Zone will be managed for late seral stages. There will be management for early successional habitat if natural disturbance processes are not providing adequate amounts of habitat for species with viability concerns. However, as portrayed in the Final Environmental Impact Statement, this amount of early successional habitat management would not exceed 8 percent of the total amount of riparian habitat found across the Huron-Manistee National Forests (Final Environmental Impact Statement, page III-195). The definition and criteria for sensitive species designation is described in the revised Forest Plan Glossary, Appendix F.

PC#: 245
Public Concern: The Huron-Manistee National Forests should provide more specific information about from where, to where, the minimum width of Streamside Management Zone distances apply and if the measurement is horizontal from the edge of the water or along an angular rising embankment (see page II-18, Table II-11, Streamside Management Zones). An example of calculation would be most helpful.

Response: The revised Forest Plan uses the term Streamside Management Zone in lieu of filter or buffer strip (Appendix F, revised Forest Plan). The revised Forest Plan states, "The minimum Streamside Management Zone width should be a minimum of 100 feet from each side of the stream or lake shore. This is a horizontal distance along the ground. Width should be increased with increases in slope percent," as displayed in Table II-11.

Timber Resource Management:

PC#: 246
Public Concern: The revised Forest Plan should allow for a much longer rotation age for northern hardwoods and white pine, as this would counter balance forest fragmentation and urbanization.

Response: Rotation age is a term used to optimize timber outputs based on growth rates of various species. Table II-10, found on page II-17, Chapter II in the revised Forest Plan displays rotation age of 70-120 years for red and white pine, and northern hardwood. Therefore, it is expected that these forest types may be managed beyond 100 years. In addition, the Forests have designated large areas of old growth (174,000 total old growth acres) that will allow northern hardwood and white pine to grow well beyond 120 years.

PC#: 247
Public Concern: The Final Environmental Impact Statement should disclose forest certification options or opportunities.

Response: The suggestion of the Forest Service taking a lead in third-party certification of wood harvested on National Forest System lands is considered to be a Regional and or National decision and not a Forest Plan revision level decision.

PC#: 248
Public Concern: The Final Environmental Impact Statement should not grant so many timber harvest exemptions on unsuited forestland, particularly salvage logging, because snags and fallen logs provide critical habitat for cavity nesting birds, other species, and provides soil nutrients.

Response: Suitability is a term related to the production of forest products, and not whether the land has the capability of growing trees. Many acres of the Huron-Manistee National Forests are termed unsuitable because the management intention is not to manage for forest products. Such areas include lands where the primary objective is barrens, savannahs, openings, old growth, campgrounds, and other administrative sites. Any harvesting that occurs in these areas is to facilitate attainment of the management objectives for the areas and for producing timber products. Any salvage in these areas is primarily aimed at public safety.

PC#: 249
Public Concern: The revised Forest Plan should include guidelines for leaving trees in clumps after timber harvesting.

Response: Leaving trees in clumps or as individuals is permitted in the revised Forest Plan. The final determination, however, is a site-specific concern and is thus, outside the scope of the Forest Plan revision.

PC#: 250
Public Concern: Timber sale contracts should include a clause that requires contractors to clean-up debris at logging sites.

Response: Slash debris created by timber sales is disposed of based on site-specific needs of the area being logged. Additionally, the removal of garbage and other waste associated with timber harvest operations is required as part of timber sale contracts. It should be noted, however, that these are site-specific issues related to individual timber sale contracts and are outside the scope of the Forest Plan revision.

PC#: 251
Public Concern: The Huron-Manistee National Forests should increase the amount of timber harvest because of the economic benefits to local communities, including payment-in-lieu of taxes to Counties, and to wildlife habitat.

Response: The Forest Service has an interest in the condition and vibrancy of local economies, especially as they relate to the use of public lands. This is based upon both the agency's congressionally mandated interests in healthy communities generally as well as its local concern as a partner with vested interests in the life of particular communities. Well-managed public lands and vibrant local communities are not mutually exclusive. The Forest Service recognizes that the National Forests contribute to the timber volume supply of local and regional mills. Supplying natural resources for those industries is one goal of the revised Forest Plan. How much timber volume can be offered for sale is dependent on a careful consideration of all resources values and the Forest Service allocated budgets. There are also other goals as outlined within the Huron-Manistee National Forests revised Forest Plan. These include, but are not limited to, promoting ecosystem health and conservation using a collaborative approach to sustain the nation's forests and wetlands, and providing forest settings and natural resources that enhance social, economic, and ecological benefits at local, regional, and national levels. The selection of an alternative is dependent on many tangible and intangible indicators. Sustainability of the ecosystem, providing for a variety of forested settings and opportunities, providing for treaty rights, and contributing to the economic stability of communities are just a few of the considerations in the Selected Alternative selection.

Disclosure of the economic benefits of the Selected Alternative can be found in the Final Environmental Impact Statement, Chapter III, beginning on page III-271.

PC#: 252
Public Concern: The Huron-Manistee National Forests should conduct an audit of the timber sale program as commercial logging on National Forest System land is losing money and is unacceptable.

Response: Although economics is an important and vital consideration in the management of National Forest System lands on the Huron-Manistee National Forests, it is not the only consideration. The Huron-Manistee National Forests revised Forest Plan strives to balance ecological, economic, and social needs and resources in accordance with a variety of environmental laws, regulations, and policies. Implementation of the Selected Alternative has been determined to best meet these three precepts of ecosystem management as disclosed in the Final Environmental Impact Statement, revised Forest Plan, and the Record of Decision.

As such, financial auditing of the timber program or other resource programs is an administrative action. The following quotation by a Forest Service Director Ann Bartuska addresses the below cost argument: "Before any national forest timber is sold, it is appraised, and the objective of this appraisal is to estimate the material's fair market value. When a sale is offered, it is offered competitively and the contract is normally awarded to the firm offering the highest bid. These requirements have been imposed to help ensure that the government is justly compensated for any timber it sells. Arguments of a subsidy arise from the fact that the price the government

charges for timber is not always sufficient to cover its full costs of sale preparation and administration. A variety of factors contribute to this situation. These include the following: 1) the Forest Service's multiple use mission does not stress maximizing dollar returns; 2) the agency, as a consequence of various process and procedural requirements relating to such things as public involvement, analysis of potential environmental effects, and administrative appeals, tends to be a relatively high cost timber producer; 3) the price the agency can charge for timber is determined in an open market where most purchasers have a choice of buying either public or private stumpage; and 4) the price the agency can charge is dictated by the commercial value of the material being sold, and over time priorities have shifted to favor removing relatively small diameter, low value material. Given these realities, the Forest Service cannot always price its timber high enough to cover its full costs of production, because if it did so, in some instances it would only succeed in driving itself out of the market, which would compromise its ability to use timber sales as a management tool, even for achieving stewardship purpose objectives. Experience indicates that typically this would cause the net cost of national forest management to increase, not decrease. This outcome is traceable to the fact that timber sales, unlike other ways of manipulating vegetation, such as, prescribed burning, use of chemical herbicides, and mechanical treatments such as cut and leave - generate some revenue to help offset their costs of implementation." (USDA-Forest Service, Ann Bartuska, Director, Forest and Rangeland Staff, file code 2400 November 6, 2000).

PC#: 253
Public Concern: The Huron-Manistee National Forests should harvest maples and beeches on highlands because they do not represent the historical original forest.

Response: Northern hardwood forests dominated by sugar maple and American beech were a significant vegetation type before the logging era of the late 1800s and early 1900s. These forests typically occurred on moraines and glacial till plains but most evidence suggests that they contained more hemlock, white pine, and yellow birch than in today's northern hardwood forest. Glacial moraines today will continue to be dominated by northern hardwood forests as forest succession proceeds. Where specific management goals and objectives are to be achieved, the Huron-Manistee National Forests will continue to harvest northern hardwoods on an uneven-aged basis. The Selected Alternative strives to achieve a balance in the amount of timber scheduled for harvest with consideration for other resources.

PC#: 254
Public Concern: The revised Forest Plan should implement forest management activities in Management Areas 6.1 and 6.2, outside of designated old growth areas because management can provide habitat diversity.

Response: Forest management is permitted in Management Prescription Areas 6.1 and 6.2 to provide habitat diversity (revised Forest Plan, Chapter III, 2400, I and II, pages III-6.1-6 - III-6.1-7 and III-6.2-4 - III-6.2-5.

PC#: 255
Public Concern: The Huron-Manistee National Forests should require loggers to pay for tops of trees, if they remove them.

PC#: 256
Public Concern: The Huron-Manistee National Forests should account for the revenues received from timber harvesting on National Forest System land.

Response: The revenues generated from sale of timber from the National Forest are returned to the general United States Treasury, the same place that taxes and other revenues go. The exception to this is that 25 percent of returns from timber sales and other revenues generated from National Forests, such as campground fees, go to the State of Michigan, and are then allocated to the Counties that have National Forests within them. These monies are to support local schools and roads in these counties. Stumpage from timber sales is paid to the U.S. Treasury. Timber sale contractual specifications are outside the scope of analysis for Forest Plan revision.

Trails – Infrastructure Management:

PC#: 257
Public Concern: The revised Forest Plan should define trail maintenance standards.

Response: There are no longer maintenance levels for trails. These are now called trail maintenance priorities and the definitions have been added to the revised Forest Plan, Appendix F.

PC#: 258
Public Concern: The Forest Plan should manage Off-Highway Vehicle use in a manner that maximizes economic opportunity for adjacent gateway communities while minimizing the impact to overall rangeland health, vegetation, wildlife and other visitors.

Response: The Forests are managed in accordance with the Multiple-Use Sustained-Yield Act of 1960. This Act states, “It is the policy of the Congress that the National Forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes.” Management of National Forests includes management of uses of all the various renewable surface resources in a combination that best meets the needs of the American people. Therefore, the Huron-Manistee National Forests is not managed to maximize economic opportunity associated with any one resource value. The Selected Alternative strives to achieve a balance between and integration of ecological, economic, and social factors into a comprehensive strategy aimed at protecting and enhancing sustainability, diversity, and productivity of the Huron-Manistee National Forests’ natural resources.

The following objective is included in the revised Forest Plan, Chapter II, page II-5, “Cooperate with local communities when considering site-specific proposals that would provide access to services in local communities.”

PC#: 259
Public Concern: The Forest Plan should provide a reasonable range of access opportunity to see the backcountry through Off-Highway Vehicle use by youth, the aging population, and the physically handicapped.

Response: The Huron-Manistee National Forests evaluated a range of alternatives in the Final Environmental Impact Statement that are consistent with laws, regulations, and policies and provide a reasonable range of access opportunities. The Selected Alternative strives to achieve a balance between, and integration of, ecological, economic, and social factors into a comprehensive strategy aimed at protecting and enhancing sustainability, diversity, and productivity of the Huron-Manistee National Forests' natural resources.

The following objective is included in the revised Forest Plan, Chapter II, page II-6, "Provide a variety of access opportunities for a range of user abilities consistent with management area direction and Standards and Guidelines." Off-Highway Vehicle use is on designated trails only.

PC#: 260
Public Concern: The Forest Plan should use proven recreation management principles to manage vehicle-based recreation that is sustainable, manageable, and enjoyable.

Response: The revised Forest Plan recognizes that Off-Highway Vehicle use is an acceptable use of National Forest System lands. The Forests provide more than 700 miles of designated Off-Highway Vehicle trails. Trail systems provide a variety of difficulty levels, experiences, and opportunities for different vehicle types. Where possible, trails are destination based. At this time, the Forests do not have designated routes; however, the Forests have approximately 3,200 miles of forest roads open to licensed vehicles.

PC#: 261
Public Concern: The Forest Plan should actively manage Off-Highway Vehicle use by providing an extensive, designated route trail system that satisfies the experience desired by Off-Highway Vehicle recreationists, which keys upon the monitoring factors of customer satisfaction, education, compliance, and enforcement.

Response: The Huron-Manistee National Forests are multiple-use recreation Forests with numerous uses, of which Off-Highway Vehicle is one. The revised Forest Plan provides general direction for recreation opportunities through Standards and Guidelines. Recreation management programs are site-specific and determined through budget and environmental analysis, including public involvement. Proposed trails or routes, as well as road closures, are addressed on a site-specific basis and include public involvement.

The following Goal and Objective is included in the revised Forest Plan, Chapter II, on page II-4, "Use a combination of personal contacts, brochures, maps and informational signing to inform and educate users about forest management."

PC#: 262
Public Concern: The Forest Plan should evaluate roads and determine where closures are necessary; recognizing that existing motorized use will be displaced to other areas. In order to minimize impacts to the remaining roads, trails and areas open for Off-Highway Vehicle use should allow for additional access and additional recreational opportunities in suitable areas.

Response: The Huron-Manistee National Forests recognize that as closures occur recreation use may be displaced; however, we must also manage for resource values. The Forests have determined that the designated trails and road system is the best system to protect resource values and ensure public safety. Additions to the road or trails system will be addressed on a site-specific basis, consistent with the Standards and Guideline of specific management areas.

PC#: 263
Public Concern: The Forest Plan should enhance Off-Highway Vehicle user accountability and responsibility to ensure common sense compliance among the majority of forest visitors so that law enforcement can handle the small percentage of willful abusers.

Response: Law enforcement and user education is currently addressed in the revised Forest Plan in Forest-wide Goals and Objectives (revised Forest Plan, Chapter II, page II-3). Information is currently available at Forest Service offices, on the Huron-Manistee National Forests website, at developed trailheads, and at local businesses.

PC#: 264
Public Concern: The Forest Plan should develop, maintain, and reroute trail systems for Off-Highway Vehicle use that meet reasonable criteria for acceptable resource mitigation that is based on credible site-specific science.

Response: The considerations suggested in the comment have been integral to the development of the current motorized trails system on the Huron-Manistee National Forests. Numerous Standards and Guidelines for Management Areas are designed to protect environmental values while providing recreational opportunities to forest users. As such, the elements are considered during the site-specific analysis on proposed trails and routes. Disclosure of impacts by Off-Highway Vehicles on wildlife and habitats is in many places in the Final Environmental Impact Statement, including pages III-299 through 312.

PC#: 265
Public Concern: The Forest Plan should provide for a wide range of accessible and highly desirable recreation experiences and opportunities for visitors and community residents while protecting other resource values.

PC#: 266
Public Concern: The Forest Plan should provide for a safe environment for Off-Highway Vehicle use, weighing expectations for risk and challenge, through identification of appropriate designated routes.

Response: The revised Forest Plan addresses mixed use and safe multiple use of trails in the Goals and Objectives (revised Forest Plan, Chapter II, page II-3 – II-6). Safety considerations have been integral to the development of the current motorized trails system on the Huron-Manistee National Forests.

Uneven-aged Management:

PC#: 267
Public Concern: The Forest Plan emphasized even-age timber management to the exclusion of uneven-aged management. The Huron-Manistee National Forests should be experimenting with uneven-aged management techniques to produce mixtures of age classes and species resulting in a more disease-resistant and fire-resistant forest.

Response: The revised Forest Plan allows for both uneven- and even-aged management techniques. Both techniques have advantages and disadvantages depending upon the particular site and desired management. Both techniques can be prescribed at the site-specific level depending upon the situation and, as such, more site-specific analysis would occur at the project implementation level and be disclosed during the environmental analysis process.

PC#: 268
Public Concern: The Huron-Manistee National Forests should be using uneven-aged timber management as the preferred method of harvesting in semiprimitive areas. The Final Environmental Impact Statement should disclose why even-aged timber management would best achieve the desired conditions in semiprimitive areas.

Response: Descriptions for Management Areas 6.1, semiprimitive nonmotorized, and 6.2, semiprimitive motorized, can be found on Page II-2, Table II-1of the revised Forest Plan. Goals and Objectives and Desired Future Conditions of the 6.1 and 6.2 Management Areas are found beginning on pages III-6.1-4 and III-6.2-2, respectively. Forest managers have a range of options for managing the 6.1 and 6.2 areas. Foremost is management emphasis on natural or natural-appearing environments, including old growth and low concentrations of roads and/or trails. Both management areas can provide low to moderate volumes of forest products. However, Standards and Guidelines limit harvesting of timber to improving visual quality, reducing hazardous fuels, pest management, fuelbreaks, or for maintaining diversity of wildlife habitats. Even-aged management is the primary silvicultural system used for the sole reason that the Huron-Manistee National Forests are largely comprised of those timber types, aspen, jack pine, oak, and red and white pine, that require and benefit from even-aged management. These are shade-intolerant species requiring full sunlight to adequately regenerate (silvicultural systems are described in more detail in Appendix C of the revised Forest Plan).

User Conflicts:

PC#: 269
Public Concern: The Huron-Manistee National Forests should enforce the recommended hours to be on the Pine River for those canoeists who are customers of the watercraft rental companies.

Response: This issue is addressed in the Pine River National Scenic River Management Plan, which is not being updated as part of the Forest Plan revision process.

PC#: 270
Public Concern: The Huron-Manistee National Forests should not use the increase in semiprimitive Management Areas, possibly increasing conflicts between motorized and nonmotorized trail users, or sensitive species habitat (a map for analysis would be desirable) as a pretext to closing roads and trails in the future.

Response: The concern is with the Goal on page II-6 of the revised Forest Plan, which states, "Design and manage trails for a primary season use, to discourage conflicting uses, such as prevent motorized and nonmotorized uses from occurring at the same time during any season of the year. Trails may also have secondary uses." (See Goal in the Glossary, pages F-15 and F-28). When a conflict arises, the Forests consider a range of alternatives to address the issues on a case-by-case basis. These issues often involve trail design, safety, or resource concerns. All new trail construction is considered on a site-specific basis consistent with management area direction. Nothing in the revised Forest Plan precludes analyzing new proposals, as long as they meet the desired future condition of the management area. A map of endangered, threatened, and sensitive species was not made available because all proposals are evaluated through a site-specific analysis that includes a survey for endangered, threatened, and sensitive species species. Cumulative impacts will be addressed in each site-specific analysis. Effects of old growth on the alternatives can be found in the Final Environmental Impact Statement, Chapter III, pages III-251 through 259.

PC#: 271
Public Concern: The Forest Plan should not accommodate hunting, equestrian use, or mineral exploration and development for the Corsair Trail System.

Response: There is a possibility that the above-mentioned user conflicts may occur within the Corsair Trail System. However, Management Area 7.1 is allocated for highly concentrated use, so users should anticipate encountering the sights and sounds of human activity. The Standards and Guidelines for Management Area 7.1 require mineral related facilities to be placed outside the Management Area, when practical, and contain other mitigation measures to reduce potential impacts to users. The maximum development identified in the 7.1 Management Area is one well per 640 acres.

PC#: 272
Public Concern: The Huron-Manistee National Forests should be more accommodating when recreationists want to organize an event on National Forest System land.

Response: The Huron-Manistee National Forests try to accommodate recreational events on National Forest System lands to the extent that this can be accomplished without undue compromise to other resource values and outputs. However, organized recreational events require special-use permits and these take a certain amount of time to complete. Special use permitting is accomplished at the District level on a case-by-case basis and is not a Forest Plan revision issue.

Vegetation Concerns – Pre-settlement:

PC#: 273
Public Concern: The Forest Plan's desired future condition should reflect pre-settlement condition of forest types and age classes with fewer acres of aspen and more pine and northern hardwoods.

Response: The Notice of Intent to prepare an Environmental Impact Statement for revision of the Forest Plan (2003) identified ecosystem restoration as an area in need of change during the Forest Plan revision process. A requirement found in the 1982 National Forest Management Act regulations (36 CFR 219.19) includes ecological restoration. The purpose is to increase the probability of maintaining diverse and viable populations of plant and animal species on the Forests. However, these ecological restoration attempts are not intended to return the Forests to pre-European conditions. Significant improvements are made in the Selected Alternative in meeting the needs of late successional species, which are often edge sensitive, and those needing prairie and barrens conditions. These improvements are achieved through allowing some areas of the Forests to naturally succeed to late successional forest types, developing old growth areas (Forest Plan Amendment #24), promoting greater structural and compositional diversity within stands of all age classes, and creating large openland areas. The revised Forest Plan calls for managing aspen for wildlife such as golden-winged warbler, ruffed grouse and white-tailed deer, which also provides an important resource for the local timber industry. Forest-wide Goals and Objectives, Standard and Guidelines, and Management Area Direction all provide habitat direction for a variety of game and non-game species. The Forests are required to manage for outdoor recreation, range, timber, watershed, wildlife, and fish values. That means that the management of National Forests includes management of uses of all the various renewable surface resources in a combination that best meets the needs of the American people.

Vegetation Concerns – Tree Species:

PC#: 274
Public Concern: The Huron-Manistee National Forests should plant American chestnut seedlings because chestnuts provide mast for turkeys, deer, grouse, and other wildlife species.

Response: The revised Forest Plan (pages II-4 to II-6) does not preclude the reintroduction of native or desired non-native species. Site-specific reintroduction projects are outside the scope of this document.

PC#: 275
Public Concern: The Huron-Manistee National Forests should not remove Scotch pine that are providing shade and serving as a nurse tree for oak and pine; the Forests should not alter this natural process.

Response: Scotch pine is a non-native species. The revised Forest Plan does not include direction specific to Scotch pine. The limited number of Scotch pine treatments is addressed at the site-specific project level.

Wetlands:

PC#: 276
Public Concern: The Huron-Manistee National Forests should include wetlands in the restoration and management effort because these lands are important to other wildlife species.

Response: The Species Viability Evaluation process (Final Environmental Impact Statement, Appendix B, and in the planning record file) addressed the need to manage and restore various wetland communities (Final Environmental Impact Statement, Appendix B, Table B-3, page B-13). These include Great Lakes marshes, beach/dunes, river/streams, ponds/lakes, marsh, bogs/fens, shrub/scrub wetlands, and riparian/lowland hardwood floodplains.

PC#: 277
Public Concern: The Huron-Manistee National Forests should revisit the goal to "acquire, create, and manage shallow water – emergent marshes" because it is incompatible with other goals, not cost effective, nor considers the labor-intensive nature of the proposal.

Response: The revised Forest Plan, Chapter III, Management Area Direction for specific management areas does provide goals and objectives to "acquire, create, and manage shallow water-emergent wetlands." Management Area examples include 2.1 or 4.3. The Final Environmental Impact Statement, Affected Environment-Biological Resources, Wetland, identifies the significant loss of these habitats in Michigan and the northern Lower Peninsula of Michigan. More than 50 percent of Michigan's wetlands have been lost. Over 90 percent of the shallow wetlands in Michigan have been lost since pre-settlement conditions (Kashian 1995). The Final Environmental Impact Statement, Appendix B, Species Viability Evaluation, describes the approach the Forests used to conduct species evaluation process, which identified species at risk, collecting information on species, grouping species, and developing conservation measures to be incorporated in the revised Forest Plan. The marsh habitat group and associated species were identified for evaluation through this process. The Final Environmental Impact Statement, Chapter III – Affected Environment and Environmental Consequences discloses the direct, indirect, and cumulative effects for the revised Forest Plan. These goals and objectives provide for the maintenance and creation of additional habitat to meet viability needs of species associated with this habitat group.

PC#: 278
Public Concern: The Huron-Manistee National Forests should expand protection to address the management of adjacent uplands for wetland inhabitants. Adjacent upland habitats are critical for feeding, overwintering, and nesting for some wetland-dwelling reptiles and amphibians. The revised Forest Plan should establish a buffer that minimizes habitat disturbance to adjacent uplands for the benefit of amphibians and reptiles, contributing to the protection of wetland habitats.

Response: Wetlands are considered part of the riparian area as defined on Page III-34 of Final Environmental Impact Statement and in the glossaries of the revised Forest Plan and Environmental Impact Statement. Streamside Management Zones will be applied from the

water's edge along lakes, streams, and wetlands with standing water. The exception is for wetlands within landscapes of sandy outwash plains (LTA1). In this landscape, Streamside Management Zones will not be used around wetlands as this best emulates natural disturbances, such as fire.

We recognize and agree with the need for wetlands and riparian areas to be connected with uplands. Approximately one-third of our 173,000 acres of designated Old Growth areas are made up of riparian areas and wetlands, which are connected to upland habitats.

Clarifications have been made to the final documents.

Wild – Scenic – Recreational Rivers:

PC#: 279
Public Concern: The Huron-Manistee National Forests should include Wild and Scenic river management plans in the Forest Plan revision process.

PC#: 280
Public Concern: The Huron-Manistee National Forests should update Wild and Scenic river plans outside of the Forest Plan revision process and then amended to the revised Forest Plan.

Response: The intent of the Huron-Manistee National Forests has not been to incorporate revision of the five existing river plans into the Forest Plan revision process. River management plans are more site-specific in nature than the revised Forest Plan. Asking the public to remain involved in reviewing and commenting on numerous draft proposals simultaneously would create a large burden for the commenters and would most likely reduce the quantity and quality of public comments. River plans will be revised individually and the process will incorporate public involvement. Revision of the Pere Marquette river plan is underway. Additionally, the specific management plans for Wild and Scenic Rivers are incorporated into the revised Forest Plan by reference, as are other plans, such as, Kirtland's warbler and Karner blue butterfly recovery plans. For these and any areas outside the Wild and Scenic River boundaries, updates or changes will be done after completion of site-specific environmental analysis and extensive involvement of the public.

PC#: 281
Public Concern: The Huron-Manistee National Forests should prohibit motorized watercraft in 6.1 Management Areas and on the Au Sable and Manistee Rivers and on designated Wild and Scenic rivers. The Forests should also implement a canoeing permit system on the Au Sable.

Response: The Forest Service has jurisdiction over the National Forest System lands adjacent to lakes, rivers and streams, whereas the State of Michigan has jurisdiction over watercraft use on most waterways. Prohibition of watercraft is outside the authority of the Forest Service and, therefore, outside the scope of Forest Plan revision. The Forest Service controls canoe livery access to landings located on National Forest System lands through special use permits. Canoe liveries are covered in the River Management Plans for designated areas of the Au Sable and Manistee Rivers. As such, it is a planning process separate from Forest Plan revision.

PC#: 282
Public Concern: The Huron-Manistee National Forests should not transfer 9.2 Study Wild and Scenic River land to "Lands-in-Holding" designation, creating a de-facto 8.1 Management Area.

Response: The study rivers list in the revised Forest Plan, Chapter II, Table III-16, page III-9.2-2, was originally identified in the 1986 Forest Plan as amended. No new rivers are proposed for lands-in-holding status except for one mile on the Pine River National Scenic River. The Forests are required to protect the potential outstandingly remarkable values for which these rivers may be designated under the National Wild and Scenic Rivers system. This is both Congressional intent and national direction. The rationale for this direction is to ensure that management activities do not occur which could inadvertently result in a river no longer qualifying for future designation.

PC#: 283
Public Concern: The status and management plans for state designated Natural Rivers should be noted in the revised Forest Plan.

Response: Chapter II, page II-4 of the revised Forest Plan, Goals and Objectives, has been updated to include language recognizing the State Natural Rivers Act.

PC#: 284
Public Concern: The Final Environmental Impact Statement should disclose the effects of Streamside Management Zone activities along State designated Natural Rivers.

Response: The effects of Streamside Management Zones are disclosed in the Final Environmental Impact Statement on page III-35. Specific effects along Natural Rivers are not disclosed because the Forest Service does not manage those areas differently.

Wilderness – Roadless Areas:

PC#: 285
Public Concern: The Forest Plan should state that hunting, fishing, and hiking are not encouraged in the Research Natural Area portion of the Nordhouse Dunes Wilderness. In addition, provision of drinking water sources could be considered in the Wilderness.

Response: The revised Forest Plan, Chapter III, page III-9.1-2, Goals and Objectives for 9.1 Management Areas, states, "Recreation in the area such as hiking, hunting, camping, and fishing will not be encouraged." The desired future condition also states, "Management direction for candidate Research Natural Areas will be the same as Research Natural Areas." However, the congressionally designated 5.1 Nordhouse Dunes Wilderness desired future condition supercedes the Research Natural Area goals and objectives. Further, Standards and Guidelines for Nordhouse Dunes state that drinking water or drinking water development will not be provided (revised Forest Plan, page III 5.1-6). The Forests identified in the Need for Change, Notice of Intent, September 18, 2003, that there were no critical or compelling reasons to change the direction or strategy of the Nordhouse Dunes Research Natural Area.

PC#: 286
Public Concern: The Forest Plan should not designate any more Wilderness because it would deny motorized access to the Forests.

Response: During the Forest Plan revision process, the Forests reviewed all Management Area designations based on regional and national guidelines, including an evaluation and inventory of roadless and wilderness areas (Final Environmental Impact Statement, Appendix D). The results indicated that no additional areas were identified for consideration as wilderness. Currently, there is one wilderness area on the Huron-Manistee National Forests and no Alternative proposes a change in wilderness designation.

PC#: 287
Public Concern: The wilderness regions that are preserved as National Forests were never intended to be used for economic gain.

Response: The Forest Service is mandated to provide multiple uses that provide many forest products and values. At the time of their creation, management of the Huron-Manistee National Forests was based on the Weeks Act (March 1, 1911) as amended by the Clarke-McNary Act (June 7, 1924). The Weeks Act authorized Congress to appropriate funds to acquire lands for "the conservation and improvement of the navigability of a river," and it focused on the lands containing the headwaters of such rivers. The Clarke-McNary Act broadened the purpose for purchase of lands for Forest Reserves by authorizing purchase of "such forested, cut-over, or denuded land within the watersheds of navigable streams as…may be necessary to the regulation of the flow of navigable streams or for the production of timber."

Since that time, Congress has passed a body of laws that require a broader natural resource focus when it comes to the management of National Forest System land. Laws such as the Multiple-Use Sustained-Yield Act of 1960, the Endangered Species Act of 1973, the Forest and Rangeland Renewable Resources Planning Act of 1974, and the National Forest Management Act of 1976 are examples of laws that apply to these lands and require consideration of a broader array of resource issues and public values than did the two acts under which the Forests were originally established.

The alternatives considered for the Forests' revised Forest Plan fulfill the goals associated with the body of laws directing management of national forest lands, including the Weeks Act and the Clarke-McNary Act. The management of National Forests includes management of uses of all the various renewable surface resources in a combination that best meets the needs of the American people. The Selected Alternative maximizes net public benefits, is consistent with resource integration and management requirements, and complies with long-term goals and objectives as outlined in the revised Forest Plan. Ecological, economic, and social considerations are balanced within environmental laws, regulations, and policies.

PC#: 288
Public Concern: The Forest Plan should increase the amount of roadless area because the Forests are being overrun by Off-Highway Vehicles.

PC#: 289
Public Concern: The Huron-Manistee National Forests should apply the Eastern Wilderness Act the way it was intended; less restrictive in regards to establishing Wilderness. The guidelines from the Regional Office were essentially illegal as there are many acres on the Forests that qualify for Wilderness status.

PC#: 290
Public Concern: The intent of the Eastern Wilderness Act was to create a set of criteria that recognized Eastern conditions and were therefore less restrictive than those in the Wilderness Act, not more restrictive. As the Huron-Manistee has applied criteria, it appears more difficult for roadless areas to qualify as suitable for Wilderness. This contradicts the intent, and the language, of the Wilderness Act.

PC#: 291
Public Concern: The Huron-Manistee has thousands of acres suitable for additional Wilderness study and designation. However, Roadless and Wilderness review disqualifies all areas, using arbitrary parameters defined by the Region 9 office. None of these guides have any basis in the Wilderness Act and the disqualification of lands this early in the process is blatantly illegal. In fact, there are many lands in the Huron-Manistee that have Wilderness qualities including semi-primitive motorized and non-motorized areas, lands adjacent to Wilderness areas, large wetland complexes, and lands adjacent to Wild and Scenic River corridors.

PC#: 292
Public Concern: The Draft Environmental Impact Statement does not properly review the Hoist, Reid, or Cook Semi-primitive Non-motorized areas. A detailed Wilderness evaluation needs to be done for these areas.

Response: As part of Forest Plan revision, the Huron-Manistee National Forests completed a roadless inventory to determine if any areas qualified for potential wilderness recommendation. Appendix D of the Final Environmental Impact Statement outlines the roadless and wilderness inventory process, criteria, and findings. The Huron-Manistee National Forests do not know specifically which parameters the commenter believes are arbitrary (comment #291) but the Forests believe that the inventory was conducted in full accordance with the Forest and Rangeland Renewable Resources Planning Act of 1975. Additionally, the Forests followed the requirements for inventory and evaluation set forth in 36CFR 219.17, Forest Service Manual 1923, and Forest Service Handbook 1902.12. The Regional Forester issued a letter dated August 1997 to provide clarification of this same Manual and Handbook direction and to provide for consistency in the interpretation and application of manual and handbook direction across national forests in the Region. The Forests adhered to the guidance in this letter.

The Huron-Manistee National Forests recognize that criteria for identifying roadless and potential wilderness areas in the Eastern United States are to be conducted with the understanding that most lands show some signs of human activity and modification but that these lands have shown highly recuperative capabilities. Despite this, the roadless and wilderness inventory process in Appendix D of the Final Environmental Impact Statement demonstrates that there are very few areas within the proclaimed boundaries of Huron-Manistee National Forests

that even remotely approach wilderness criteria for the Eastern United States. This results from the highly fragmented ownership patterns within the proclamation boundaries of the Forests, a very dense network of federal, state, and county roads, and the relatively high population density and associated infrastructure of the northern Lower Peninsula of Michigan.

In addition to the roadless wilderness evaluation, the Forests conducted a geographic information systems analysis that demonstrated that 99 percent of both Forests are within one-half mile of a road and 90 percent of both Forests are within one-quarter mile of a road. This analysis did not include level 1 and 2 roads, which, if included, would yield a much greater road density.

PC#: 293
Public Concern: The Huron-Manistee National Forests should introduce innovative forest management strategies in the Nordhouse Wilderness Area.

Response: The Wilderness Act of 1964 precludes vegetative management for the purposes of fuel reduction and salvage of insect and disease infested trees in Wilderness Areas, including Nordhouse Dunes Wilderness Area. Vegetation adjacent to Nordhouse Dunes Wilderness will be managed in accordance with the management direction for the Wilderness. These include project-level, or site-specific decisions and analyses and, thus, are outside the Forest Plan revision process.

Management of vegetation adjacent to Nordhouse Dunes Wilderness is in accordance with Management Area direction and, additionally, would be handled in a site-specific analysis; as such, it is not a Forest Plan revision issue.

Wildlife:

PC#: 294
Public Concern: Why is the golden-winged warbler selected as a surrogate when it is not a Regional Foresters Sensitive Species?

Response: Surrogate species are selected because they represent other wildlife species that use a particular habitat and habitat condition. Therefore, they do not have to be Regional Forester's Sensitive Species. Other species that are not Regional Forester's Sensitive Species on the Huron-Manistee National Forests, but are surrogate species; include the American Bittern, American Marten, Black-backed Woodpecker, Bobolink, Northern Harrier, Red-headed Woodpecker and Upland Sandpiper, and Whip-poor-will. The golden-winged warbler was selected to represent the shrub-scrub and aspen/birch (early) habitat groups because it breeds on the Huron-Manistee National Forests and utilizes these habitats. Succession eliminates the early successional habitats the species prefers. U.S. Fish and Wildlife Service breeding bird survey information indicates that golden-winged warbler populations in the state of Michigan are declining, on average, 7 percent per year since 1966.

PC#: 295
Public Concern: The Final Environmental Impact Statement should disclose the effects on wildlife of opening 3,626 miles of roads and trails to snowmobiles.

Response: The revised Forest Plan does not change the miles of snowmobile trails; however, it does open unplowed roads to snowmobile use. The Selected Alternative restricts snowmobile use in areas such as deer wintering areas, endangered, threatened, or sensitive species areas, or other areas requiring protection. The potential impacts of unplowed roads open for snowmobile use have been disclosed in the Final Environmental Impact Statement, page III-303.

PC#: 296
Public Concern: The Final Environmental Impact Statement's Species Viability Evaluation should not have been so subjective and based largely on the opinion of biologists. The result is heavy-handed management to fulfill requirements of the Environmental Species Act at the expense of other land management laws.

Response: Ecological, economic, and social considerations are adhered to and balanced within environmental laws, regulations, and policies. Please refer to the Final Environmental Impact Statement, Chapter III and Appendix B – Species Viability Evaluation.

PC#: 297
Public Concern: The Final Environmental Impact Statement should recognize that viable populations of some species cannot be attained by timber harvest and that others require large-scale planning or other management needs for harvesting to be of benefit.

Response: Viable populations are addressed in the Final Environmental Impact Statement, Appendix B. The Forests strived to ensure the distribution, abundance, and habitat requirements of species adapted to mature forests and those requiring large opening complexes. The Selected Alternative best meets the long-term goals and objectives, integrating biological, social, and economic factors into a comprehensive strategy aimed at protecting and enhancing sustainability, diversity, and productivity of the Forests' resources.

PC#: 298
Public Concern: The Huron-Manistee National Forests should increase snowshoe hare populations by regenerating cedar swamps.

Response: The revised Forest Plan includes maintaining existing cedar communities (Final Environmental Impact Statement, Appendix B). The need for additional regeneration establishment of these communities was not part of the Need for Change, and therefore, was not included as part of the revision process. Establishing new areas of cedar communities on a landscape scale is very difficult and costly. It should be noted that snowshoe hare utilize a variety of habitats, not only cedar communities. The Huron-Manistee National Forests are providing sufficient habitat for populations of snowshoe hare through forest management activities. For example, jack pine areas clearcut as Kirtland's warbler habitat and grouse aspen management areas create excellent habitat for snowshoe hares.

PC#: 299
Public Concern: The Final Environmental Impact Statement should disclose the reason why the Cerulean warbler was chosen as a surrogate species because the warbler is not representative of any forest condition on the Huron-Manistee National Forests.

Response: The Cerulean warbler was chosen as a surrogate species for the mixed hardwood habitat type group along rivers and lakes (Final Environmental Impact Statement, Chapter III, pages III-92 – III-94) through the Species Viability Evaluation process (Final Environmental Impact Statement, Appendix B). This species was requested by species experts and other interested individuals because of the fact that the species is present on the Huron-Manistee National Forests, and because the Forests have suitable habitats. Additionally, the Cerulean warbler is a Regional sensitive species and it was petitioned to be listed under the Endangered Species Act. The Cerulean warbler can be monitored effectively and is consistently found within the habitat type, it is not a generalist. Please refer to Appendix B of the Final Environmental Impact Statement for more information on the Species Viability Evaluation process.

PC#: 300
Public Concern: The Final Environmental Impact Statement should disclose the effects of fragmentation on wildlife.

Response: The Forests agree that the occurrence of fragmentation is important, and therefore, was included in the analysis of alternatives. Potential impacts are disclosed in the Final Environmental Impact Statement, Chapter III, for each habitat group effects, and by individual species, where relevant. Spatial arrangement of habitats was a determining factor in the Species Viability Evaluations.

PC#: 301
Public Concern: The Final Environmental Impact Statement should recognize and utilize the four national bird plans and their regional components: the North American Waterbird Conservation Plan, the U.S. Shorebird Conservation Plan, the North American Management Plan, and the North American Landbird Conservation Plan and the Fish and Wildlife Service's Birds of Conservation Concern.

Response: While these documents are not specifically referenced in the revised Forest Plan and the Final Environmental Impact Statement, the Forests are familiar with these plans, and they are used in assisting the Forests to achieve site-specific objectives and, therefore, are outside the scope of Forest Plan revision.

PC#: 302
Public Concern: The Huron-Manistee National Forests should coordinate with the Audubon Society’s Important Bird Areas Program and provide additional disclosure and discussion of nominated breeding / migratory bird sites, including the lower Manistee River, Walkinshaw Wetlands, Nordhouse Dunes, and many Kirtland warbler-breeding sites.

Response: Two new objectives were added to the revised Forest Plan, Chapter II, Natural Resource, referencing the four national bird plans and the Important Bird Area Program.

The Fish and Wildlife Service’s Birds of Conservation Concern was used as a reference for development of the Huron-Manistee National Forests’ species list for which viability evaluations were conducted. The evaluations were conducted to meet viable population objectives.

Individual species were grouped as a part of the different habitats, and viability analysis was conducted within the Forests to ensure that habitat objectives were provided.

The Important Bird Areas Program recognizes that habitat loss and fragmentation are the most serious threats facing populations of birds across America and around the world. The Huron-Manistee National Forests, through Species Viability Evaluation Appendix B, has identified those places that are critical to birds during some part of their life cycle. Chapter III of the Final Environmental Impact Statement disclosed the effects of the alternatives on these habitat groups and associated bird species.

The revised Forest Plan has established Management Areas that provide emphasis for conserving bird habitat, such the Kirtland's Warbler Management Areas and Walkinshaw Wetlands. To date, the identification of Important Bird Areas in Michigan has not been completed. The Huron-Manistee National Forests will coordinate with the Audubon Society in the Important Bird Areas Program and provide some additional information so that areas on the Forests can be considered.

PC#: 303
Public Concern: The Huron-Manistee National Forests should not emphasize endangered species to the exclusion of other species, particularly game species because these wildlife populations and hunting recreation will be reduced. A balance of habitats from forest regeneration to maturity, including openings will perpetuate biodiversity.

PC#: 304
Public Concern: The Huron-Manistee National Forests should protect forests, thus helping wildlife because the public is very sensitive to Michigan's forests.

Response: The Selected Alternative strives to achieve a balance and integration among ecological, economic, and social factors to provide a comprehensive strategy aimed at protecting and enhancing sustainability, diversity, and productivity of the Huron-Manistee National Forests' natural resources. A range of habitats are managed for, ranging from regenerating to mature forest, and incorporating wildlife openings. This is intended to perpetuate biodiversity for game and non-game species (Final Environmental Impact Statement, Chapter III).

PC#: 305
Public Concern: The Forest Plan should manage about one-third of the Forests in old growth and the remainder managed on a twenty to forty year rotation-harvesting program because about fifty wildlife species require old growth forest for survival, there are one-hundred that require, or use, early successional forest.

Response: The Forest Service is mandated to provide multiple uses that provide many forest products and values. The Forests conducted a Species Viability Evaluation during the Forests' plan revision process (Appendix B, Final Environmental Impact Statement). As disclosed in the Final Environmental Impact Statement, Alternatives B and C provide habitat for the viability of all species (Chapter III, Final Environmental Impact Statement).

The suggested shortened rotation age for two-thirds of the Huron-Manistee National Forests would not provide a reasonable diversity of forest products, and could be expected to have detrimental impacts on soil, water, air, and many recreational opportunities, and therefore, was not considered in detail or analyzed further.

PC#: 306
Public Concern: The Final Environmental Impact Statement requires a correction between the conclusions on page III-341 with the corresponding Table III-63 on page III-342, and possibly the accuracy of the information on pages III-168 – III-182.

Response: The narrative on page III-358 of the Draft Environmental Impact Statement, describing Table III-62, now found on page III-359 of the Final Environmental Impact Statement, was in error, and was corrected. The information beginning on pages III-178 through 192 of the Final Environmental Impact Statement is accurate in describing the effects of the alternatives on ruffed grouse.

List of Respondents to the Proposed Forest Plan and Draft Environmental Impact Statement by Affiliation

The table below displays the self-identified government agencies, elected officials and Tribal entities who submitted comments on the Proposed Forest Plan and Draft Environmental Impact Statement during the formal comment period. The unique identifying number that was assigned to each response letter for tracking purposes is also listed here. A copy of each comment letter received from the agencies listed in Table J-1 follows.

Table J-1. List of Governmental Respondents to the Proposed Forest Plan and Draft Environmental Impact Statement.

Commenting Agency	Comment Letter Number
Federal Agencies	
United States Department of the Interior	1644
United States Department of the Interior, Fish & Wildlife Service	1500
Unites States Environmental Protection Agency	1634
Federal Elected Officials	
U.S. House of Representatives – Bart Stupak	1618
Tribal Entities	
Little River Band of Ottawa Indians	1633, 1645
State Agencies	
Michigan Department of Environmental Quality	1578
Michigan Department of Natural Resources	1652

Comment Letter 1644:

04 01644

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

TAKE PRIDE IN AMERICA

IN REPLY REFER TO:

June 20, 2005

ER 05/343

Mr. Randy Moore
Regional Forester
Eastern Region Office
U.S. Forest Service
626 East Wisconsin Avenue, Suite 800
Milwaukee, Wisconsin 53202

Dear Mr. Moore:

The Department of the Interior (Department) has reviewed the March 2005 Draft Environmental Impact Statement (EIS) and Draft 2005 Land and Resource Management Plan (LRMP or Forest Plan) for the Huron-Manistee National Forests (HMNF) in Michigan. Please give the following comments careful consideration in completing these documents.

GENERAL COMMENTS

The U.S. Fish and Wildlife Service (FWS) and the U.S. Forest Service have coordinated on several occasions for over a year and a half in the development of the Draft EIS and LRMP.

In addition to reviewing the aforementioned documents, the FWS also reviewed the Biological Evaluation (BE), which was apparently available only by request and was not provided on the Forest Service website along with the Draft EIS and LRMP. It would have been helpful to reviewers if the BE had been provided on the website. It would have also been helpful if single consolidated files, in addition to the chapter-by-chapter files, had been provided for both the EIS and LRMP. Such files allow users with high-speed internet connections to download the files to their hard drives and review the documents much more easily, including being able to quickly do word searches of an entire document for topics of most interest. Users can also easily make a CD-ROM copy of the document file, if needed. As the Forest Service depends heavily on the use of the internet for the distribution of Forest Plans, EISs, and associated documents, we encourage the Forest Service to make it a standard practice to provide such documents in single consolidated files. In addition, the Table of Contents for the Final EIS should be included with the rest of the document on the website.

FEDERAL THREATENED AND ENDANGERED SPECIES

Based upon a review of its files, the FWS concurs that the federally listed species identified in the Draft EIS constitute an accurate listing of the species known to be present within the project area. The FWS is coordinating with the Forest Service on section 7 consultation for the revised Forest Plan in accordance with the Endangered Species Act of 1973, as amended. Following the

final decision on the selected plan alternative, the Forest Service will conduct a Biological Assessment of the selected alternative, make a determination of effects to federally listed threatened and endangered species, and contact the FWS regarding that determination. Section 7 consultation will be concluded prior to the Record of Decision for this project.

We believe the standards and guidelines in the proposed Forest Plan will promote the conservation and recovery of the threatened and endangered species on the HMNF. Furthermore, we commend the Forest Service for its proactive consideration of listed species in the Forest Plan revision process. Our comments regarding specific listed species follow.

Indiana bat (*Myotis sodalis*)

Forest Plan (pages II-24 – II-27) and BE (pages 17-18): The proposed Plan and BE address the Indiana bat management actions and protective measures agreed to in the June 2003 Biological Opinion for the Continued Implementation of the HMNF LRMP (June 2003 Programmatic BO). However, the measures listed in the two documents are somewhat different, with several measures listed in the BE that are not reflected as standards and guidelines in the proposed Forest Plan. These measures are as follows:

- Regeneration units will be designed with irregular borders to provide edges for solar exposure of roost sites, interspersion of roosting and foraging habitat, and travel corridors.
- Survey and document pre- and post-harvest roost tree conditions, including inventory and protection measures.
- Create or renovate upland water sources for Indiana bat by:
    - Developing water holes in wildlife openings along the forest edge.
    - Designating Maintenance Level 1 and decommissioned roads to provide upland water sources.
    - Designing road construction and reconstruction projects to include small waterholes adjacent to the road, where feasible.
- Manage the 5-mile (8-km) radius around Tippy Dam to best benefit the bat.
- Habitat removal and modification to include considerations for minimizing potential adverse impacts, such as visual assessments of roosting habitat quality (exfoliating bark, splits/cracks, hollows, holes, dens, and cavities) or other assessment techniques such as mist-netting
- Habitat removal and modifications will employ seasonal avoidance measures, as feasible and prudent.
- Site-specific project protection measures will be developed during biological evaluations to identify appropriate protection measures.

These differences were also discussed in detail during a telephone conversation between Ms. Jessica Hogrefe (FWS) and Mr. Rex Ennis (HMNF) on May 17, 2005. The FWS requests that the Forest Service review these differences and ensure that the proposed Forest Plan and the BE are consistent in their measures for protecting and conserving the Indiana bat.

Forest Plan (page II-26, #3): We recommend that firewood cutting restrictions prohibit the removal of standing dead trees within suitable Indiana bat habitat at any time during the year and

not just from May 1 to August 31. This would avoid both direct take and indirect take of individual bats through the loss of a potential roost.

Karner blue butterfly (*Lycaeides melissa samuelis*)

As the analysis on pages 191-196 of the BE indicates, significant loss of barrens habitat (pine, oak-pine, and oak) has occurred across Michigan, and this ecosystem is now considered rare in the state. Much of this habitat loss occurred as a result of conversion to forest land, agriculture, and other development. The most significant current threat is the alteration of the historical fire regime (fire suppression). This has allowed the barrens habitats to succeed to more shrubby and forested conditions. Because of this, most remaining barrens habitat in Michigan is highly degraded. Management of the Karner blue butterfly on the HMNF will thus not only help conserve this endangered species but will also help restore and recover the barrens ecosystem in Michigan.

The Karner Blue Butterfly Recovery Plan (USFWS 2003) identifies two existing Recovery Units on HMNF lands. The Recovery Plan further identifies that four Karner blue butterfly metapopulations are necessary to achieve recovery within those Recovery Units. As a result, the Forest Service has designated Karner blue butterfly recovery habitat to manage for these four metapopulations. The Forest Service has also identified Karner blue butterfly areas, occupied and non-occupied, that fall outside of these designated recovery habitats. For purposes of our comments below, we refer to these lands as non-recovery habitats.

Proposed Forest Plan (multiple sections) and Biological Evaluation (pages 18-19): The FWS notes that the proposed Plan and the BE address the Karner blue butterfly management actions and protective measures previously agreed to in the June 2003 Biological Opinion for the Continued Implementation of the HMNF LRMP (June 2003 Programmatic BO). However, the measures listed in the two documents are somewhat different. Specifically, several measures listed in the BE are not reflected as standards and guidelines in the proposed Forest Plan. These measures are as follows:

- Trail construction, road construction, and vegetation management activities will be designed to improve potential Karner blue butterfly habitat.
- Roads and trails will be managed and maintained in a manner to protect areas with wild lupine. Where this is not feasible and damage is occurring, trails and roads may be relocated or decommissioned.
- Provide dispersal corridors in order to facilitate dispersal between occupied and unoccupied areas (suitable habitat sites).
- Activities will be scheduled and completed when they are least likely to impact any life stage of the butterfly.
- Watershed management activities that are incompatible with Karner blue butterfly will be excluded.

In addition, although discussed in the BE, the proposed Forest Plan does not reflect a measure for: (1) total amount of habitat to be managed for recovery and non-recovery Karner blue butterfly populations and (2) habitat management targets by decade to meet these goals.

These differences were also discussed in detail on a telephone conversation between Ms. Jessica Hogrefe (FWS) and Mr. Rex Ennis (HMNF) on May 17, 2005. We request that the Forest Service review these apparent differences and ensure that the proposed Forest Plan and the BE are consistent in their measures for protecting and conserving the Karner blue butterfly.

Biological Evaluation (pages 119-123): Alternative B allows barrens management that should meet the metapopulation goals set for the HMNF by the Karner Blue Butterfly Recovery Plan within a 20-year time frame. Without the Forest Service's proactive participation, recovery of the Karner blue butterfly would not be possible. We commend the Forest Service's progressive pursuit of the metapopulation goals with which it is tasked.

Of the 2,026 acres of known occupied Karner blue butterfly habitat on the HMNF, roughly 69 percent or 1,398 acres are located outside of the designated recovery habitat. Page 120 of the BE states that most of this non-recovery habitat is in forest upland openings and would "likely continue to exist into the foreseeable future." Page 122 of the BE further indicates that Alternative B provides the opportunity to restore greater than 65 percent (909 acres) of the non-recovery habitat within 20 years, with the remaining 35 percent (489 acres) managed after that (i.e., sometime after 20 years). The Forest Service analysis, however, does not address the effects of this management plan on those non-recovery habitats that are occupied by Karner blue butterflies. We request that the analysis for Alternative B in the final BE address the following issues:

1. Clarify the amount of occupied non-recovery habitat that will be maintained within the first and second decades of the Forest Plan.
2. Clarify the amount of occupied non-recovery habitat that *will not* be managed within the first two decades of the Forest Plan. Evaluate whether this habitat will still be suitable for Karner blue butterfly after this time period. Determine the likelihood of Karner blue butterflies persisting on this unmanaged habitat under this management timeline.

Page 123 of the BE indicates that Alternative C provides more opportunities for barrens management and Karner blue butterfly conservation than Alternative B. Under Alternative C, the HMNF would approach barrens restoration more assertively, completing more of the restoration targets within the first 20 years. This alternative would not only allow the HMNF to meet the metapopulation goals for recovery habitat, but would also maintain all of the occupied non-recovery Karner blue butterfly habitat. Overall, Alternative C represents the most progressive approach to management of barrens that could benefit the Karner blue butterfly.

Based on the information provided in the draft BE, the FWS is concerned that Alternative B will not provide adequate management for all Karner blue butterflies currently occupying the HMNF. The FWS supports actions that will not only meet the recovery goals, but also those actions that will maintain the Karner blue butterflies located in non-recovery habitat. We believe that recovery goals represent minimum population levels for survival and recovery of listed species but that long-term conservation of listed species beyond recovery by sustaining ecosystems should be considered. If Alternative B will not maintain all occupied Karner blue butterfly acres in a manner that will allow those populations to persist, we recommend adoption of the barrens restoration actions proposed under Alternative C.

Piping plover (*Charadrius melodus*) and Critical Habitat

Given the recent nesting activity in Ludington State Park, just south of the Nordhouse Dunes Wilderness Area, it is likely that piping plovers will nest on the HMNF in the near future. We are encouraged to see the Forest Service's preparation for piping plover nesting included in the proposed Forest Plan.

Biological Evaluation (pages 14-16) and Proposed Plan (Sections III-4.3 and III-5.1): The FWS notes that the proposed Forest Plan and draft BE integrate the piping plover management actions and protective measures agreed to in the June 2003 Biological Opinion for the Continued Implementation of the HMNF LRMP (June 2003 Programmatic BO) and Biological Opinion for Piping plover nest protection activities (December 6, 2004). However, the measures listed in the two documents are somewhat different. Specifically, the measure listed in the BE that prohibits fireworks within 3,281feet (1000m) of active nests and the measure requiring pets to be on a leash within piping plover critical habitat do not appear to be reflected in the proposed Forest Plan. We request that the Forest Service review these apparent differences and ensure that the proposed Forest Plan and the BE are consistent in their measures for protecting and conserving the piping plover and critical habitat.

Biological Evaluation (page 95): The FWS suggests that the Forest Service include the most up-to-date information regarding piping plover status in the BE. Information regarding the status of the piping plover in the Great Lakes in 2004 indicates that there were 55 nesting pairs observed. While there were no nests on the HMNF, birds nested nearby and were observed foraging in the Nordhouse Dunes Wilderness. Thus far in 2005, birds have also been observed in Nordhouse Dunes, but no nests have been documented.

Kirtland's warbler (*Dendroica kirtlandii*)

The FWS greatly appreciates the leadership that the HMNF has provided for more than 30 years for Kirtland's warbler management. The Forest Service's contribution has been and will continue to be an essential component for the long-term survival of this species. We believe that the standards and guidelines in the proposed Forest Plan will continue to promote the conservation and recovery of Kirtland's warbler on the HMNF. The Plan maintains the Forest Service's long-standing commitment to the Kirtland's warbler and the Forest Service's critical role as a leader in its recovery. Most notably, the Plan proposes an increase in the acres of essential habitat. We commend the Forest Service for its proactive consideration of Kirtland's warbler in the Forest Plan revision process and the FWS looks forward to continued cooperation in the recovery process.

Draft EIS (page II-13): Table II-2 states that Alternative B will increase the amount of Kirtland's warbler essential habitat to 135,965 acres. However, page II-32 of the proposed Forest Plan and page 80 of the BE state that this alternative will reach a breeding habitat goal of 88,300 acres. Please clarify how much essential habitat is being proposed under Alternative B.

Biological Evaluation, page 80: The new measure: "Provide breeding habitat for a minimum of 420 pairs of Kirtland's warblers through sustained harvest and regeneration of an average of 1,600 acres annually" does not appear in the proposed Forest Plan. We believe that this annual

target for habitat management is important to meeting the Forest Service's goals for Kirtland's warbler. We request that the Forest Service review this apparent discrepancy and ensure that the proposed Plan and the BE are consistent in their measures for protecting and conserving this species.

Previous FWS comments submitted to the HMNF: The FWS transmitted specific comments on the Kirtland's warbler section of the draft BE via email on November 29, 2004, and February 2 and May 5, 2005. As the Forest Service considers these comments, please contact the FWS with any questions.

Pitcher's thistle (*Cirsium pitcheri*)

Biological Evaluation (page 20) and Forest Plan (Sections III-4.2, III-4.3, and III-5.1): The proposed Plan and draft BE address the Pitcher's thistle management actions and protective measures previously agreed to in the June 2003 Biological Opinion for the Continued Implementation of the HMNF LRMP (June 2003 Programmatic BO). However, the measures listed in the two documents are somewhat different. Several measures listed in the BE do not appear to be reflected as standards and guidelines in the proposed Forest Plan. These measures are as follows:

- Limit foot traffic in areas occupied by Pitcher's thistle; design foot traffic on dunes to limit impacts to Pitcher's thistle.
- Limit ORV traffic to trails. (Management Areas 4.2 and 4.3 only)
- Close some roads into Pitcher's thistle areas. (Management Areas 4.2 and 4.3 only)
- Apply a management direction that indicates that prescribed burning will be very unlikely to be used in dune habitats.
- Prohibit watershed management activities in Pitcher's thistle habitat.
- Control introduced species.
- Provide protective/informative signage for public.
- Increase law enforcement to protect Pitcher's thistle.

These differences were also discussed in a telephone conversation between Ms. Jessica Hogrefe (FWS) and Mr. Rex Ennis (HMNF) on May 17, 2005. We request that the Forest Service review these apparent differences and ensure that the proposed Forest Plan and the BE are comparable in their measures for protecting and conserving Pitcher's thistle.

Bald eagle (*Haliaeetus leucocephalus*)

Previous FWS comments submitted to the HMNF: The FWS transmitted specific comments on the bald eagle section of the draft BE via email on November 29, 2004, and February 2 and May 5, 2005. As the Forest Service considers these comments, please contact the FWS with any questions.

Eastern massasauga rattlesnake (*Sistrus c. catenatus*)

The FWS commends the HMNF for integrating eastern massasauga rattlesnake conservation into the proposed Forest Plan. As a candidate for listing under the Act, the eastern massasauga rattlesnake is not afforded protection under the Act, but we encourage its consideration in environmental planning. Candidate species are under active consideration by the FWS for addition to the Federal List of Endangered and Threatened Species and may be proposed or listed during implementation of the proposed Forest Plan. If unnecessary impacts to candidate species can be avoided, the likelihood that they will require the protection of the Act is reduced. Addressing candidate species at this stage of consultation provides a focus on the overall health of the local ecosystem and helps avert potential future conflicts. We appreciate the Forest Service's consideration and protection of candidate species in the Forest Service's planning efforts.

MIGRATORY BIRDS

The Draft EIS does not appear to provide any reference to, or recognition of, the four national bird plans and their regional components (the North American Waterbird Conservation Plan, the U.S. Shorebird Conservation Plan, the North American Management Plan, and the North American Landbird Conservation Plan). These plans were developed with the cooperation of numerous state, federal, and nongovernmental agencies over a period of years. They represent a unified recognition of priority landscapes and regionally or nationally important species which should augment any Forest Service priority or management species identified by a particular national forest. There is also no mention of the FWS's Birds of Conservation Concern, an additional and regionalized effort to point out species that require conservation efforts in the Midwest, including Michigan.

The Important Bird Areas Program is a national effort of the National Audubon Society to identify state-by-state areas of particular importance to breeding and/or migratory birds. At least four areas on the HMNF have been nominated, including the lower Manistee River, Walkinshaw Wetlands, Nordhouse Dunes, and many Kirtland warbler breeding sites. We recommend that the Forest Service coordinate with the Audubon Society in this Important Bird Areas Program and, if appropriate, provide some additional discussion of the nominated areas in the Final EIS. Brief descriptions of the four bird conservation plans and links to them, as well as links to other regional planning and management resources related to birds, can be found in the Enclosure to this letter.

FISHERIES AND AQUATIC RESOURCES

We believe that Alternative B will benefit the fisheries and aquatic resources of the HMNF. This alternative emphasizes the maintenance of water quality and quantity and the restoration of stream systems. Alternative B should maintain the water quality and trophic status of lakes, reduce non-native invasive species, and enhance and maintain riparian zones. Our comments regarding fisheries and aquatic resources follow.

Brook trout (*Salvelinus fontinalis*)

The Forest Service identifies brook trout as a Management Indicator Species, with 40 individuals/acre as a management guideline (Draft EIS, Appendix G, page G-4). The EIS states that this is only 25 percent of the 160 individuals/acre which is believed to be the minimum needed to maintain a viable population in Michigan (Gowing and Alexander 1980). The Final EIS should discuss whether this population target will allow the HMNF to meet its objective for maintaining viable populations of existing native and desired non-native fish species. The FWS suggests that 160 individuals/acre is a more appropriate population target for brook trout.

Under the Fish section (page II-35) in the proposed Forest Plan, a guideline is set of one brook trout per 100 square meters in tributaries where the species exists. The Final EIS should provide an explanation of how this figure was derived, as well as how this guideline is related to the MIS brook trout guideline. Unless there is a clear reason for the two guidelines, the FWS recommends that the MIS guideline be used for brook trout management.

Lake sturgeon (*Acipenser fulvescens*)

Lake sturgeon are presently found in the Muskegon and Manistee Rivers. We suggest the Forest Plan include standards and guidelines to address actions needed to protect and enhance habitat needed for adult lake sturgeon staging and spawning and juvenile rearing. We also recommend that the Plan include monitoring for the lake sturgeon.

General aquatic habitat management and restoration

While the Forest Plan addresses the potential problems created by stream crossings, we recommend that the Forest Service conduct a forest-wide inventory of stream crossings. This would allow the Forest Service to identify and target watersheds with fish-passage concerns and potential restoration sites. We suggest that a GIS layer with the above information would provide a powerful tool to identify, rank, and prioritize sites. In addition, we recommend that the Plan include long-term monitoring to identify when the stream crossings are failing.

We recommend that the Forest Plan identify a personal watercraft plan to limit or close access to at-risk or sensitive lakes and rivers. This plan should address motorized use and minimize shoreline erosion in the riparian zone due to high boat and personal watercraft traffic. We also suggest that implementing no-wake and off-limit areas would help reduce erosion and protect habitat, as well as provide relief from visual and noise disturbances

Guideline VIII-C1 on page II-35 of the Forest Plan states that vegetation that attracts beaver should be discouraged within 200 feet of streams. The Final EIS should provide a more detailed discussion of this guideline, including what vegetation the Forest Service considers to be attractive to beavers and how the Forest Service proposes to control such vegetation.

We suggest the Forest Service include a goal in the Plan that encourages cooperation and coordination on restoration projects with other federal agencies, tribes, and natural resources professionals.

Riparian Management

Upstream thermal migration of warmer temperatures is a problem nationwide due to past logging, mining, agricultural and other practices within riparian zones. We recommend that the Forest Service establish an objective to monitor and study this effect to assist with reclaiming and stabilizing its cold water streams and habitats.

We recommend that the Water standards and guidelines on pages II-18 thru II-22 of the Forest Plan establish a minimum riparian buffer that limits disturbance (i.e., physical degradation, noise, air pollution) from ORV and snowmobile use.

Guideline 1a on page II-18 of the Forest Plan allows for active management for early successional habitat within the streamside management zone for threatened, endangered, and sensitive species where natural disturbance processes are not providing adequate habitat on a case-by-case basis. We recommend that the Forest Service augment this guideline to indicate the factors that will be considered in determining where early successional habitat management may be necessary.

Guideline I-A1-b2 on page II-18 of the Forest Plan addresses the source of trees used in large woody debris restoration in streams. We concur with this guideline and further recommend that trees be taken from outside the riparian zone. This will leave the riparian canopy intact and eliminate potential aggravation of erosion sites.

We suggest that the Forest Service consider the needs of amphibians and reptiles that inhabit streams and riparian corridors. For example, Semlitsch and Bodie (2003) indicate that adjacent upland habitats are critical for feeding, overwintering, and nesting for some stream-dwelling reptiles and amphibians. The authors also discuss stream buffers that offer protection for most species of reptiles and amphibians. We suggest that, where necessary and appropriate, a buffer that minimizes habitat disturbance to adjacent uplands for the benefit of amphibians and reptiles would also contribute to the protection of stream habitats.

Wetlands

The discussion on page III-201 of the Draft EIS indicates that under Alternatives B, wetlands would no longer be considered part of the definition of riparian. Under this alternative, the Forest Service would not be required to: (1) maintain a 100-foot riparian buffer around wetlands and (2) manage for late seral stages in wetlands. The Forest Service's analysis determines that Guideline E on page II-22 of the Forest Plan requires that activities in wetland areas not result in a change in soils or hydrologic conditions and that this guideline would limit the impacts of many forest activities in wetlands.

While we agree with this assessment, we recommend that the Forest Service expand its protection to address the management of adjacent uplands for wetland inhabitants. For example, Semlitsch and Bodie (2003) indicate that adjacent upland habitats are critical for feeding, overwintering, and nesting for some wetland-dwelling reptiles and amphibians. The authors also discuss wetland buffers that offer protection for most species of reptiles and amphibians. We suggest that, where necessary and appropriate, a buffer that minimizes habitat disturbance to

adjacent uplands for the benefit of amphibians and reptiles would also contribute to the protection of wetland habitats.

NORTH COUNTRY NATIONAL SCENIC TRAIL

Provided below are specific comments concerning discussion, or lack thereof, of the North Country National Scenic Trail (NCT) in the Draft EIS and LRMP and recommendations for changes to be made in the Final EIS and LRMP.

Draft EIS, Chapter II - Alternatives

Page II-7: Please insert a "bullet" about management of the NCT under the Recreation, Semi-Primitive Areas, Aesthetics, and Access topic. The Department suggests the following language be used in the bullet:

- Manage the North Country National Scenic Trail in accordance with its designation as a National Scenic Trail.

Pages II-7 and II-9: Given that the NCT is a congressionally designated national scenic trail, it is a nationally significant resource which needs to be mentioned in this section of the LRMP, included in all alternatives, and should be mentioned in the section on Wilderness and Wild and Scenic Rivers (WWSR). This section could be re-titled, "Wilderness, Wild and Scenic Rivers, and Specially Designated Areas." The Department suggests the following language be used in the bullet:

- The North Country National Scenic Trail is a nationally significant trail which passes through the Forests.

Page II-9: Please insert a "bullet" about management of the NCT in the Recreation, Semi-primitive Areas, Aesthetics, and Access section. The Department suggests the following language be used in the bullet:

- Manage the North Country National Scenic Trail in accordance with its designation as a National Scenic Trail.

Draft EIS, Chapter III - Affected Environment and Environmental Consequences

Page III-263: As mentioned above, the NCT is a congressionally designated national scenic trail and needs to be mentioned in this section of the LRMP right after WWSR and before the general heading of "Trails." The Department suggests the following language be used in a bullet:

- The North Country National Scenic Trail (NCT) was designated by Congress in 1980 and passes through the Forest. It is one of only eight such trails in the United States. There are approximately 120 miles of certified trail in the HMNF with a potential for additional miles. The desired future condition for the NCT is to be managed as a path whose use is primarily for hiking and backpacking. The NCT is managed in conjunction with the National Park Service (NPS).

Page III-283: The NCT is mentioned, but no specific cumulative impacts or effects that the proposed action or alternatives may have on the NCT are considered. Please consider these potential impacts and discuss them in the Final EIS.

Page III-284: The LRMP states that hiking and walking use is projected to increase from 338,000 Recreation Visitor Use Days annually to 447,000 days by the year 2050, which is roughly a 33 percent increase. However, on the next page, the LRMP states this use is expected to remain constant. A 33 percent increase does not appear to be a constant level of use. Rather, it seems to be a significant increase in anticipated use. The LRMP fails to provide for the increase in this low impact recreation, yet proposes increases in bicycle use when the demand fails to exceed expected capacity.

The emphasis on increasing miles of trail open to bicycle use is not justified when the current numbers show there is more capacity available than is projected to be needed by the year 2050. This action is particularly troublesome when the document acknowledges that the cumulative impact of the increase capacity is likely to be less visitor satisfaction and additional user conflicts.

If the Forest Service is intending to open most trails for biking use, the Department requests that the Forest Service state a firm commitment to remove bicycle use from the NCT. This action is necessary to meet the Desired Future Condition (DFC) for the NCT as a "...path whose use is primarily for hiking and backpacking." This DFC has been agreed to in a Memorandum of Understanding (MOU) among the Forest Service, the NPS, and the North Country Trail Association (Association)(FS Agreement NO. 05-MU-11090100-007).

Page III-286: The current visitor use numbers show facilities can accommodate 61 percent of the current demand for hiking and walking uses, yet the LRMP is not suggesting any increase in the capacity for these uses. This means that by the year 2050, existing facilities will only be able to accommodate about 47 percent of the projected demand. A better use of scarce resources would be to increase the Forests' capability to meet the projected increased demand for hiking and walking rather than to surpass the projected demand for biking by a large margin.

A general policy for trails of "closed-unless-posted-open" is a far more efficient and effective method of regulating recreational uses than is a policy of "open-unless-posted-closed." We strongly suggest the Forest Service take this approach. This allows for more efficient law enforcement and the users are more motivated to protect signs that allow their use instead of removing signs that disallow their recreational use. This step would mirror the current HMNF policy on motorized uses.

Page III-289: The numbers as shown in the National Visitor Use Monitoring Survey fail to justify the proposal to increase the miles of trails available for biking uses. The numbers show existing facilities can provide for more than three times the expected use of bicycles in the year 2050. It is unreasonable for the HMNF to be committed to expanding biking opportunities when they are already able to serve three times the projected demand for bike use. This is especially worrisome to us since, according to the LRMP numbers, hiking and walking users are underserved. The LRMP acknowledges increased biking use could lead to additional conflict between bikers and hikers. Some studies have indicated hikers tend to abandon trails when hiking trails are opened to biking uses. If there is to be an expansion of trail opportunities, it should favor the underserved users (See *Off-Road Bicycle and Hiking Trail User Interactions*;

Alan W. Bjorkman, Wisconsin Department of Natural Resources, Bureau of Research, May 24, 1996, page 25).

The Forest Service, the NPS, and the Association have executed a MOU regarding the DFC of the NCT; the NCT will be managed as a path whose use is primarily for hiking and backpacking. It is inconsistent for the Forests to meet this condition when it proposes opening most trails to bikes.

Page III-291: We would, in general, prefer the increased acreage of semi-primitive, non-motorized areas as proposed in Alternative C. Areas available for non-motorized activities are at a premium in the Midwest and additional acreage should be preserved or added whenever possible. The visitor-use data shows more user days in non-motorized activities such as primitive camping, backpacking, and camping in roadless areas than are shown in motorized activities.

LRMP, Chapter II - Forest Wide Management Area Direction

Page II-6: The DFC for the NCT is correct. There should be some method of indicating the Forest Service's progress on attaining this condition.

Page II-12: The Department believes the policy on bike use on trails should be "closed-unless-posted-open." This makes more sense from a regulatory point of view in that signs prohibiting a use tend to disappear while signs that allow a use tend to stay in place. It would also be consistent with the policy on motorized use, which is also "closed-unless-posted-open."

Page II-14, section A: Please include the Trail Handbook for Trail Design, Construction, and Maintenance.

Page II-14, section B: Please include the MOU among the Forest Service, NPS, and the Association (FS Agreement No. 05-MU-11090100-007), which was signed by the Eastern Regional Forester on April 5, 2005.

We were unable to find the Huron-Manistee North Country National Scenic Trail Implementation Guide in the LRMP. The Guide should be included in the appendixes.

Page II-15: The Department definitely agrees with the prohibition on horses on the NCT. We would also prohibit the use of llamas; there is no rationale provided for permitting that use.

LRMP, Chapter IV - Monitoring and Evaluation

Page IV-11: The monitoring matrix for recreation should include information on how many miles of the NCT have been changed from "open to bike" to "hiking only."

LRMP, Appendix A - Summary of the Analysis of the Management Situation

Page A-10: The Department believes the policy on bike use on trails should be "closed-unless-posted-open." This makes more sense from a regulatory point of view in that signs prohibiting a

use tend to disappear while signs that allow a use tend to stay in place. It would also be consistent with the policy on motorized use which is also "closed-unless-posted-open." A site-specific determination for which trails are open and closed is fine.

Comments on Maps: The Department believes it is extremely important to include the route of the NCT on all maps associated with this LRMP.

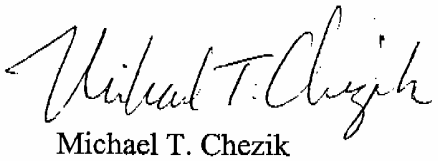
SUMMARY COMMENTS

We believe that the selection of Alternative B will benefit the listed species and critical habitat of the HMNF. One exception may be for the Karner blue butterfly, where actions proposed under Alternative C may be more beneficial. In addition, there appear to be some discrepancies between the BE and the proposed Forest Plan, which should be addressed in the final documents. We expect that comments provided directly to the HMNF by the FWS prior to this letter will also be addressed in the final documents. We also believe Alternative B will benefit the fisheries and aquatic resources of the HMNF by emphasizing the restoration and enhancement of lake, stream, and coastal Great Lakes ecosystems on the HMNF. However, we believe that some additional measures should be taken to protect physical and biological attributes of aquatic systems. In addition, the Department identifies concerns and offers recommendations concerning use of the ACT.

The Department has a continuing interest in working with the Forest Service to ensure that impacts to resources of concern to the Department are adequately addressed. For matters related to fish and wildlife resources and federally listed threatened and endangered species, please continue to coordinate with Ms. Jessica Hogrefe (project biologist) or Mr. Craig Czarnecki (Field Supervisor), U.S. Fish and Wildlife Service, East Lansing Field Office, 2651 Coolidge Road, Suite 101, East Lansing, Michigan, phone: (517) 351-2555. For matters related to concerns of the North Country National Scenic Trail, please contact Mr. Fred Szarka, North Country Trail Manager, or Mr. Ken Howell, North Country Trail Land Protection Coordinator, phone: (608) 441-5610.

We appreciate the opportunity to review the document and provide comments.

Sincerely,



Michael T. Chezik
Regional Environmental Officer

Enclosure

cc: Ms. Leanne Marten
Forest Supervisor
Huron-Manistee National Forests
1755 South Mitchell Street
Cadillac, MI 49601

References

Gowing, H. and G. R. Alexander. 1980. Population dynamics of trout in some streams of the northern lower peninsula of Michigan. Michigan Department of Natural Resources, Fisheries Research Report 1877.

Semlitsch, R.D. and J.R. Bodie. 2003. Biological criteria for buffer zones around wetlands and riparian habitats for amphibians and reptiles. Conservation Biology 17(5):1219-1228.

USFWS. 2003. Karner Blue Butterfly Recovery Plan (*Lycaeides melissa samuelis*). 134pp +appendices

Enclosure **Information for All-Bird Conservation Planning:**

***Bird Conservation Initiative Web Sites*:**

The **North American Waterfowl Management Plan** is now undergoing revision. The **2003 Update** to the Plan will combine the core elements of the original 1986 Plan and the 1994 and 1998 updates with guidance addressing the issues and conditions of the 21st century. It is available in draft form at http://northamerican.fws.gov/NAWMP/2003nawmpdraft.htm. See especially the continental population objectives and geographical and population priorities in Section IV and Appendix B. The related links on the NAWMP home page provide additional regional perspectives.

Partners in Flight, the landbird conservation initiative, maintains an information-rich website at http://www.partnersinflight.org/. It includes links to many bird resources, notably downloadable PDF versions of some 50 PIF Physiographic Area Plans, the Species Assessment Database, a Research & Monitoring Needs Database, and an extensive species by species conservation information table (http://www.partnersinflight.org/birdacct.htm). The forthcoming Continental Plan will include population estimates and regional conservation targets for all North American landbirds.

The **U.S. Shorebird Conservation Plan** is available for download at http://shorebirdplan.fws.gov/. The site also provides access to regional shorebird planning documents and technical reports, including the Upper Mississippi Valley / Great Lakes Regional Shorebird Conservation Plan.

Version 1 of the **North American Waterbird Conservation Plan** emphasizes colonial-nesting waterbirds and seabirds. Information on how to request copies is available through the publications link at http://www.waterbirdconservation.org/. A plan for the Upper Mississippi Valley / Great Lakes region is currently being reviewed and will be available in 2005.

Additional Regional Planning and Management Resources:

U.S. North American Bird Conservation Initiative (NABCI): http://www.nabci-us.org/
Breeding Bird Survey (BBS): http://www.mp2-pwrc.usgs.gov/bbs//index.html
Important Bird Areas (IBAs): http://www.audubon.org/bird/iba/
Species of concern in USFWS Region 3: http://midwest.fws.gov/Endangered/

Comment Letter 1500:

04 01500

Huron-Manistee National Forests' Plan Revision Contacts		
PART A – Forest Service Information		
Employee Making Contact: Bob Stuber		
Title: Fisheries Biologist	Unit: Supervisor's Office	
E-Mail: rstuber@fs.fed.us	Telephone: 231-775-2421	
PART B – Group Information		
Group/Org/Agency/Individual: John Weiser, U.S. Fish and Wildlife Service, Sea Lamprey Control Contact and Address: Marquette, MI		
E-Mail:	Telephone: 906-226-1213	
Date of Contact: June 15, 2005	X Initial Contact ☐ Follow Up Contact	
Information Presented At What Stage of Planning Process:	Additional Follow Up Needed:	
DEIS/Proposed Forest Plan Published in the Federal Register on 3/18/05. X Proposed Plan/DEIS Comment Period ☐ After Comment Period - Pre-Final EIS/Plan ☐ Meeting (Type-Public/Employee/Other) ☐ Other (Identify)	☐ Send DRAFT EIS ☐ Send PROPOSED FOREST PLAN ☐ Send DEIS MAPS ☐ Send CD ☐ Schedule Additional Meeting ☐ Add to Mailing List ☐ Other:	
PART C – Comments Received (attach additional pages if needed)		
Wanted to obtain my perspective on how the proposed revision of the Forest Plan may affect the sea lamprey control program. We came to the conclusion that it will not have any effect as one of the four guiding principles states that we will continue to work cooperatively with other agencies for achieving common goals. The sea lamprey is a non-native invasive species.		
PART D - Distribution		
Completed form should be mailed to: SO Planning		
PART E – Documentation (to be completed by receiving office)		
Information received:		
Date: Input into database: Filed: Copy routed (to whom): Follow up on additional action items		
Huron-Manistee National Forests - Form revised 3/7/05		

Comment Letter 1634:

JUN-20-2005 14:51 FROM:US EPA REGION 5 312 353 5374 **04 01634** P.1/6

U.S. ENVIRONMENTAL PROTECTION AGENCY - REGION 5
77 WEST JACKSON, CHICAGO, IL 60604

OFFICE OF SCIENCE, ECOSYSTEMS, AND COMMUNITIES

FACSIMILE TRANSMITTAL SHEET

TO:	FROM:
Jeffrey Pullen USFS	NEPA Implementation Section (B-19J)
COMPANY:	DATE:
231-775-5551	6/20/2005
FAX NUMBER:	FAX NUMBER:
231-775-2421	(312) 353-5374
PHONE NUMBER:	PHONE NUMBER:
	312-886-7060

RE: Huron-Manistee DEIS comments

NOTES/COMMENTS:

total no. of pages, including cover: 6

JUN-20-2005 14:51 FROM:US EPA REGION 5 312 353 5374 TO:12317755551 P.2/6

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 2 0 2005

REPLY TO THE ATTENTION OF

B-19J

Jeffrey G. Pullen, Forest Planner
Huron-Manistee National Forests
1755 South Mitchell Street
Cadillac, MI 49601

RE: Draft Environmental Impact Statement for the Proposed Forest Plan for the Huron Manistee National Forests (CEQ# 20050105)

Dear Mr. Moore:

In accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (U.S. EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Proposed Forest Plan for the Huron-Manistee National Forests in Michigan. The Huron-Manistee National Forests, two separate Forests administered together, total approximately one million acres of public land in Michigan's lower peninsula. The Forests support a variety of uses including recreation and timber production.

The DEIS evaluates three alternatives and identifies Alternative B, the proposed plan, as the Preferred Alternative. Highlights of the Preferred Alternative include management for recovery and continuance of two endangered species: the Kirtland's warbler and the Karner blue butterfly. Under this alternative, the Forest Service plans to restore and maintain approximately 58,000 acres of large-scale openings, including grasslands, prairies, and oak-pine barrens which support habitat restoration goals for several species. The Preferred Alternative also introduces fire management through establishment of fuel breaks as well as through prescribed burning to benefit fire-dependent species and habitats.

The U.S. EPA commends the Forest Service for its thorough treatment, in the DEIS, of an extensive array of natural resources and forest uses, all of which need to be evaluated in the context of the Forest Plan. We concur with the selection of Alternative B as the Preferred Alternative. The DEIS provides information which supports this alternative as the plan that will allow the Forest Service to make progress toward its goals for this forest, especially in habitat management for endangered species and on recreation management and enhancement.

The DEIS, however, was not complete in its evaluation of potential impacts of some activities that will or may occur under its Preferred Alternative. In addition, the document could be more transparent in disclosing environmental effects from other actions, such as the barrens restoration projects. For these reasons, U.S. EPA rated the DEIS an Environmental Concerns- insufficient information (EC-2). This means that the U.S. EPA has identified environmental impacts that should be avoided and suggests corrective measures which may require changes to the preferred alternative or mitigation measures that can reduce impacts. The rating also means that the DEIS does not (in some areas) contain sufficient information to fully assess environmental impacts of the preferred alternative or other alternatives that are reasonably available to the project. Specific comments follow below.

General Comments

The DEIS provides good information that is crucial to evaluating the alternatives, such as:

- The amount of acreage that is needed to support Kirtland's warbler breeding pairs, as determined in the recovery plan, as well as the deficit in acreage the Forest Service needs to address. (III-59)
- The presence of the Indiana bat on the Forests, and the general location of its hibernacula. (III-54)
- The current occurrence of the Karner blue butterfly on the forest; also, the Forest Service's indicators for this species habitat (page III- 62)

This information is found within discussions of direct, indirect, or cumulative impacts of specific alternatives. We recommend that the DEIS authors consider presenting this basic information in summary form at the beginning of the Threatened and Endangered Species section or at the beginning of the species-specific sections to make the information more accessible to the public and to allow clearer evaluation of alternatives against this information.

Soil Impacts:

Section III-16 describes direct impacts to soils that could lead to increased erosion, which could potentially affect water quality. We suggest the Final EIS (FEIS) describe mitigation to prevent or reduce erosion and increased runoff in machine-planted areas, thereby preventing or reducing water quality impacts. For example, the best management practices described in the water quality section could be incorporated into planting activities to prevent erosion as well.

Water Resources Impacts

We recommend the FEIS discuss potential impacts to water quality and quantity that may occur as a result of the Forest Plan's allowing mineral exploration and mining. (As an example, the air impacts section discusses potential impacts to air quality from mining activities on forest lands.)

The DEIS does not include a discussion of the cumulative impacts to water quantity of Alternatives B (the preferred alternative) and C.

Because mining activities and clearing activities have the potential to affect water quality and flow, we encourage the Forest Service to consider proximity to water bodies when selecting

locations for specific projects. In addition, we note that the project-specific environmental impact documents for these activities will need to fully address impacts to water.

The DEIS does not identify impaired waters or proposed total maximum daily load (TMDL) allocations for waters within the proclamation boundary. It does note on page III-5 that water quality is generally good, though exceptions exist where there are concerns with polychlorinated biphenyls, nutrients, and mercury. The FEIS should note that there are no listed impaired waters or TMDL allocations. In addition, we suggest the FEIS include a discussion of how the Forest Plan will impact or avoid impacting waterbodies that have these concerns.

Creation of Clearings/ Barrens Restoration

The restoration and maintenance of large-scale openings (500+ acres each) are new features in the Huron-Manistee's Forest Plan, according to the DEIS and per discussions with Forest Service representatives. In particular, the openings are part of restoring habitat, including prairies, barrens, and savannahs, for many species, some of which are endangered. The Forest Service will also carry out some clearing activities to create fuel breaks. Information about the clearings and their potential benefits and impacts is spread throughout the document and appears also to be incomplete. We recommend consolidating this information in a separate section of the FEIS, and adding additional information where indicated. We also suggest it may be useful to handle the clearings/restoration activities as a separate section in the Forest Plan to help the public understand the approach, its intended purpose, and its impacts. Whether or not the Forest Service opts to create a separate discussion of clearings and barren restorations, the FEIS should discuss the following:

- General locations where clearings might be created, as possible.
- Whether clearings coincide with other management activities, and whether the activities have a cumulative effect in their local area.
- Whether any barrens restoration areas may also be fuel breaks, or whether these projects will happen at separate locations.
- Potential impacts to water quality from creating and maintaining clearings.
- Plans to counteract potential impacts from creating clearings, for restoration or fuel breaks, such as increased non-native species, such as spotted knapweed (this potential impact is included in the discussion of the Karner blue butterfly)
- Soil disturbance impacts from creating clearings (this is not discussed under the soil section).
- How the clearing will be accomplished (e.g. a one-time harvest of a single clearing of 500+ acres or a progressive clearing of a designated area over a series of years).
- A discussion of restoration activities, such as planting.

Invasive and Non-Native Species

The DEIS notes repeatedly that the creation of clearings to restore barrens will provide a greater opportunity for invasive species to impact the forest. The DEIS also states that new mitigation standards for Alternatives B and C will apply to the entire range of management practices. We recommend the FEIS include a specific discussion of prevention measures the Forest Service will use under the plan to address potential invasive spread in the clearing/restored barrens areas, since these areas would be especially prone to invasive

encroachment. If the mitigation does not apply in these areas, we strongly recommend them as special emphasis areas for invasive species control.

In other forests in the region, the brown-headed cowbird has been a concern along forest edges, as an impact to other bird species. The DEIS does not mention whether parasitism by this bird is a concern and could be increased by creating barrens on the forest. If this is a concern, please include it in the FEIS; if not, it may be useful to provide some supporting documentation before dismissing the issue.

Kirtland Warbler
On page III-59, the DEIS states a recovery objective of a minimum of 1,000 pairs; however, later on the page it states that the Forests' goal is a minimum of 420 pairs. The FEIS should explain these contradictory statements, and make clear what the goal is and the timeframe.

Effects on Trails -Nonmotorized
We recommend specifying the amount of increased mountain bike trails under Alternatives B and C for direct comparison with Alternative A's 130 miles of trail access (see page III-285).

Motorized Recreation
The Preferred Alternative (the draft Forest Plan) will open 3,626 miles of trails and roads to snowmobiles, an increase over the current 600 miles of trail for this use. The DEIS did not evaluate the impacts to the Forests of this management choice. The FEIS should include an evaluation of the potential impacts to wildlife from increased snowmobile use. In addition, the barrens restoration areas may be attractive to recreational users; we recommend evaluating potential impacts to barren restoration areas from motorized uses. We realize that project-specific documents are likely to address this, but we suggest that it merits at least a general discussion about potential impacts and the Forest Service's general plans on this topic. The Forest Service may want to take motorized recreational areas into account when planning the location of barrens restoration projects.

Thank you for the opportunity to review the Forest plan and DEIS. If you have any questions, please contact Anna Miller of my staff at (312) 886-7060 or miller.anna@epa.gov.

Sincerely,

Kenneth A. Westlake, Chief
NEPA Implementation Section
Office of Science, Ecosystems, and Communities

cc: Randy Moore, Regional Forester

SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION*

Environmental Impact of the Action

LO-Lack of Objections
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS sate, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1-Adequate
The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alterative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information
The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment

Comment Letter 1618:

04 01618

BART STUPAK
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SCOTT SCHLOEGEL—*CHIEF OF STAFF*
TOM BALDINI—*DISTRICT DIRECTOR*

Congress of the United States
House of Representatives
Washington, DC 20515–2201

COMMITTEE:
ENERGY AND COMMERCE
SUBCOMMITTEES:
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TELECOMMUNICATIONS AND THE INTERNET
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CAUCUS LEADERSHIPS:
LAW ENFORCEMENT CAUCUS, *CO-CHAIR*
NORTHERN BORDER CAUCUS, *CO-CHAIR*
RURAL CAUCUS
ASSISTANT WHIP

June 20, 2005

Leanne M. Marten – Deputy Forest Supervisor
USDA Forest Service
1755 S. Mitchell St
Cadillac, MI 49601

Dear Deputy Supervisor Marten:

I am submitting comments regarding the proposed Land and Resource Management Plan (Forest Plan) and Draft Environmental Impact Statement for the Huron-Manistee National Forests which was released on March 18th.

I understand the importance of sustaining the natural habitat of our national forests and also for the Forest Service to strike the appropriate balance between conservation, recreation and economic interests when considering how to manage these important national treasures.

I commend the Huron-Manistee service employees for their work in developing this Forest Plan. The three issues of particular interest to me in the Forest Plan are the timber Allowable Sale Quantity (ASQ) figures, off highway vehicle (OHV) use in the national forest, and the issuance of leases for oil and gas drilling.

Timber Harvest:

Of the three alternatives mentioned, both alternatives B and C increase the ASQ from 858 Million Board Feet (MBF) to 910 MBF. This is a positive step considering the timber shortage in the national forests is impacting the pulp and paper industries, loggers, and truckers throughout the State of Michigan. I encourage you to adopt one of these alternatives instead of Alternative A, which leaves the ASQ equal to the figure in the last forest plan.

However, I would also strongly advocate in favor of setting higher yearly targets for timber harvests. I am aware that these targets are not included in the Forest Plan because they are set on a yearly basis, but I would like to reiterate the importance of all the national forests in Michigan coming closer to meeting, at a minimum, their target for the year as well as coming closer to the ASQ set in the Forest Plan.

Increasing the annual amount of timber harvested in the national forests has a direct economic bearing on local communities. This funding will increase jobs as well as

PLEASE REPLY TO:
☐ 616 SHELDON HOUGHTON, MI 49931 (906) 482–1371
☐ 2 SOUTH 6TH STREET SUITE 3 CRYSTAL FALLS, MI 49920 (906) 875–3751
☐ 1229 WEST WASHINGTON MARQUETTE, MI 49855 (906) 228–3700
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☐ 200 DIVISION STREET PETOSKEY, MI 49770 (231) 348–0657
☐ 111 EAST CHISHOLM ALPENA, MI 49707 (989) 356–0690
☐ 512 EAST HOUGHTON AVENUE WEST BRANCH, MI 48661 (989) 345–2258

DISTRICT TOLL FREE: 800–950–REP1 (7371)

revenues generated for counties. The Forest Service returns 25 percent of gross revenues of timber sales to the counties where the timber sales are located. These funds are used for local schools and roads. Our local economies and the investments made in the mills, equipment and transportation by the forest product industry depend upon the national forests working toward higher timber harvests in the years to come.

OHV Trails:

I would also encourage the adoption of Alternative B when determining the appropriate areas in the forest for OHV use. This alternative would designate 17,148 acres of land throughout the forest for possible trail use. This is approximately 6,000 more acres than in Alternative A, which is identical to the acres that were permitted for use in the previous plan. Furthermore, Alternative C is not striking a proper balance between recreation and other interests because it designates no areas where OHV use would be permitted.

It is imperative that a sufficient number of acres remain open to OHV use so that the Huron-Manistee Forests can achieve their own goal of providing a multi-use forest.

Moreover, it is crucial that the Forest Service establish some type of policy during hunting seasons that would permit individuals to use their OHV in areas where these vehicles are not typically permitted if they are not physically able to access their favorite hunting areas and deer blinds on foot.

Oil and Gas Leases:

I would also like to address the section of the proposed Forest Plan that deals with oil and gas leases. As you know, I have long been concerned with this type of drilling in environmentally sensitive areas.

The old forest plan allowed for the lease of national forest land in the Huron-Manistee to Savoy Energy. It is because of this that a new gas drilling project is slated to begin sometime in the coming months in an environmentally sensitive area.

This proposed drilling site is located in close proximity to the pristine Mason Tract Region along the Au Sable River. Although safety requirements are in place, it only takes one accident to impact the ecological environment of the Mason Tract. The threat of the release of deadly hydrogen sulfide gas, known as sour gas, during this drilling process is very real. This gas can cause serious health problems for those who are exposed to it, and every precaution should be taken to ensure this gas is not released.

The fact that the current Forest Plan specifically allows oil and gas leases is extremely concerning to me due to the fact that more land could be leased to individuals seeking to develop oil and gas wells along the Au Sable River or around the Mason Tract.

As I stated above, I recognize and support multiple uses of our national forests, but because of the proximity of the Huron-Manistee to the Au Sable River, the Mason Tract, and other precious resources, protection of these features should be paramount.

Therefore, I would urge you to take all possible precautions when deciding which acres are made available for oil and gas leases and also strongly recommend that as few acres as possible are made available for these leases.

I hope you will take my concerns and recommendations into account when making your decision regarding the many different uses in the Forest Plan. Thank you for your consideration.

Sincerely,

Bart Stupak

BART STUPAK
Member of Congress

BTS/ll

Comment Letter 1633:

04 01633

Little River Band of Ottawa Indians/Natural Resources Department

Bob Hardenburgh, Director

375 River Street
Manistee, MI 49660
Telephone: (231)723-1594
Fax: (231)723-8873

June 20, 2005

To: Jim Thompson, District Ranger, Cadillac-Manistee Ranger District

From: Bob Hardenburgh, Director

Subject: Comments regarding the proposed Huron-Manistee Forest Plan

Thank you for the opportunity to comment on the Huron-Manistee Forest Plan. I appreciate the meetings and correspondence with the LRBOI Natural Resources Department Staff and I believe they have an excellent understanding of the proposed Plan and its direction over the next 15 years. Following are comments regarding the aquatic sections of the plan.

The LRBOI is pleased by the proposed aquatic MIS species, the brook trout and the mottled sculpin. The brook trout is an excellent candidate because it is a desired harvestable fish but also indicates unique components of the aquatic resource with the monitoring not confounded by heavy stocking by the State of Michigan. The mottled sculpin, being ubiquitous throughout the streams of the Forest should be a capable metric when coupled with the brook trout. The Tribe has numerous fish sampling sites within the Forest where we have collected data on both the mottled sculpin and brook trout. If so desired, we would provide you with the data.

Overall, LRBOI supports a holistic watershed approach to management. There is a concern that some forest management decisions are being made without thorough consideration of other activities in the watershed. The fragmented nature of the National Forest leads to unique complications that require a comprehensive approach in management activities. This Proposed Forest Plan Revision is a framework from which holistic management can continue to develop.

Below please find comments regarding sections of the Forest Plan.

Forest-wide Management Area Direction

Forest Plan – Chapter II (Goals, Objectives, and Desired Future Conditions)
Support:

- The Plan addresses levels of large woody debris in 1-4 order streams. The Tribe ultimately supports a Plan which promotes a healthy riparian which will contribute substantially and naturally to the large woody debris input into rivers.
- Integration of historical environment and cultural information into plans, assessments, analyses, and decision documents.

Concern(s):

- In the desired future conditions section, specific numbers of large woody debris structures were stated per 300 feet of stream. How were these numbers attained?

Forest Plan – Chapter II (Standards and Guidelines)

2300 Recreation, Wilderness, and Related Resource Management
Support:

- There is protection for lake and stream riparian areas. Specifically no camping within 200 feet and locating motorized trails 1000 feet from rivers and lakes where possible.

Concern(s):

- The Huron-Manistee is an extremely heavily used recreational river with associated impacts to the riparian area. There is a lack of guidelines addressing this issue

2500 Watershed Management - Riparian Vegetation Management Guideline 1-a (II-21)
Concern(s):

- Management for early successional habitat for ETS species and species with viability concerns are allowed under the proposed Plan on a site-specific basis. This is allowable if natural disturbances are not providing the appropriate quantities. There is no guideline for what is an adequate amount and what will be the standard used in this decision making process. We would recommend a standard or guideline is set.

2500 Watershed Management -- Aquatic Restoration Guideline 3-b (II-23)
Concern(s):

- There are not comprehensive guidelines for the clearing of navigational hazards and there is no monitoring in regards to the changes due to clearing practices.

2600 Wildlife, Fish, and Sensitive Plant Habitat Management - Fish Guideline A-1-a (II-29)
Support:

- Monitoring of brook trout populations.

Concern(s):

- In Guideline A-1-a it indicates a level of 1 fish per 100 square meters be maintained. The Tribe would request that you provide information and justification as to how this number was established.

2600 Wildlife, Fish, and Sensitive Plant Habitat Management - Endangered, Threatened, and Sensitive Species Guideline C
Concern(s):

- There are standards and guidelines listed for many RFSS. However the are no standards and guidelines on the lake sturgeon a species of concern to both the USFS and the LRBOI. The Tribe requests that these standards and guidelines be established and that we could discus this further with the USFS. Additionally, there are no monitoring plans for the lake sturgeon. The LRBOI is conducting extensive sturgeon monitoring and would invite the USFS to include monitoring in the Plan and to assist the Tribe with their monitoring as it is a species of mutual interest.

7700 Transportation System – Provisions for Facilities Guideline A-4-e (II-43)
Support:

- The guideline states that river crossings will be designed to minimize sedimentation. The Tribe supports an aggressive plan to reduce sedimentation from stream-crossings.

Forest Plan – Chapter IV (Monitoring and Evaluation)
Concern(s):

- There are no explicit details about how aquatic monitoring will be accomplished in the proposed Forest Plan Chapter IV.
- Chapter IV describes species monitored and the frequency of monitoring. However, there is no information on how this will be achieved.
- There is no mention of sensitive species being monitored. This should be a high priority. Such species would include lake surgeon, channel darter, creek heelsplitter, and pugnose shiner.

General Comments
Support:

- The use of brook trout and mottled sculpin as MIS species.

Concern(s):

- FERC-related standards are omitted from the Plan. This would seem critical to the maintenance of water quality and habitat within the Manistee River corridor.

Sincerely,

Bob Hardenburgh
LRBOI Natural Resource Department Director

Comment Letter 1645:

04 01645 received via e-mail

Little River Band of Ottawa Indians
Natural Resource Department

375 River Street - Manistee, MI 49660 - Toll Free: (866) 723-1594 - Fax: (231) 723-8873

June 20, 2005

Jim Thompson, District Ranger
Cadillac-Manistee Ranger District
412 Red Apple Road
Manistee, MI 49660

Dear Mr. Thompson,

The Little River Band of Ottawa Indians Natural Resource Department would like to thank the U.S. Forest Service for the opportunity to comment on the Proposed Huron-Manistee Forest Plan. The Little River Band commends the U.S. Forest Service for their continued efforts in working with Native American tribes on the numerous issues affecting our natural resources. These government to government relations are necessary to ensure sustainability of our natural resources for future use and enjoyment of both native and non-native people.

The Little River Band Natural Resources department supports a holistic approach to natural resource management and encourages a comprehensive approach in managing the natural resources throughout the Huron-Manistee Forest. Upon reviewing the Proposed Forest Plan Revision the tribe has some concerns regarding the revision primarily relating to the monitoring of habitat fragmentation throughout the forest as well as the selection of management indicator species (MIS).

A major concern of the Little River Band is the increased habitat fragmentation that is taking place throughout northern Michigan and the entire Great Lakes Region. The increased destruction and fragmentation of habitat throughout the region is a serious threat to biological diversity. The Little River Band supports the Forest Services goals set forth in the Proposed Forest Plan to reduce the miles of roads throughout the forest; therefore, facilitating a decrease in the extent of fragmentation. However, it is requested that the USFS take further action to monitor the degree and intensity of fragmentation on lands within the Manistee National Forest.

One way the Little River Band suggests the Forest Service monitor this fragmentation is by selecting one or more carnivores to serve as Management Indicator Species. Carnivores are believed to be particularly vulnerable to local extinction in fragmented landscapes because of their relatively large ranges and low numbers. The decline and extirpation of top predators from fragmented systems could generate trophic cascades that alter the structure of entire ecological communities (Crooke and Soule 1999). The persistence of these environmentally sensitive and ecologically pivotal species may be indicative of the integrity of the entire ecosystem. Mammalian carnivores can serve as useful tools for the study of land

management practices and how these practices affect habitat connectivity and fragmentation.

The Little River Band appreciates the U.S. Forest Services dedication in protecting the lands and waters throughout Michigan and looks forward to continued cooperation in protecting our natural resources.

Miigwetch,

Robert Hardenburgh-
Director, Natural Resources Department

Comment Letter 1578:

04 01578

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
CADILLAC DISTRICT OFFICE

JENNIFER M. GRANHOLM
GOVERNOR

STEVEN E. CHEST
DIRECTOR

June 2, 2005

F.SUPV
Dep.F.S
Administrative Staff
Fire Staff
Operations Staff
Public Affairs Officer
Resource/Planning Staff
LEO

Mr. Jeff Pullen, Planner
Huron-Manistee National Forests
1755 South Mitchell Street
Cadillac, MI 49601

Dear Mr. Pullen:

SUBJECT: Proposed Land and Resource Management Plan and Draft Environmental Impact Statement for Huron-Manistee National Forest

We have reviewed the proposed plan and draft impact statement, and commend the Forest Service for its efforts. The proposed plan has many features that will preserve and restore the State's water resources. We have noted a few specific items on which we will comment.

The National Pollutant Discharge Elimination System (NPDES) generally requires permits be obtained for activities that disturb an acre or more of land where some portion of the disturbed land discharges storm water to a lake, stream or wetland, or wetland contiguous to a lake or stream. It seems probable the Service would undertake such an activity. It is not clear how this will be addressed.

Over the past many years, the Service has had good success working in partnerships to restore watersheds. We urge you to continue these efforts, and we ask special note be made in the plan to encourage these efforts.

Recreational fisheries sometimes take a toll on riparian habitat. Consider including some standards and guidelines on how the Service intends to address this.

We encourage you to adhere to the Best Management Practices (BMP) put forth in "Water Quality Management Practices on Forest Land" when working in the Streamside Management Zone (SMZ). Consider referencing the practices in your "Guidelines" section.

There appears to be an inconsistency between guidelines for SMZ early successional habitat enhancement, and discouraging beavers along trout streams.

We ask that the standards and guidelines for large woody debris removal for navigation be made consistent with the State's natural rivers program, where applicable. It also appears the proposed guideline (extent necessary) is too vague to monitor.

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Consider adding the standards and guidelines for the 10 aquatic regional forester sensitive species.

The Standards and Guidelines include ". . . protect state classified streams." How will the Service know the streams are being protected?

The Transportation System standards and guidelines say that for the design of water crossings where aquatic habitat protection is considered, design will minimize sedimentation. We suggest that all crossings consider aquatic habitat protection.

The Draft Environmental Impact Statement (EIS) says that the FERC License order will be in the standards and guidelines. It is not obvious to us that these are there. The Draft EIS discusses the difference between Alternatives B and C by the use of "exceptions." This seems at odds with Table 1-2 when it comes to early successional habitat management in riparian zones. The Draft EIS mentions the maintenance of 2,500 acres of early successional habitat in the SMZ (see 111-22); however, later (see 111-74), it suggests 5,000 acres will be maintained. Please clarify.

Thank you for the opportunity to comment.

Sincerely,

Michael Stifler
Cadillac District Supervisor
Water Bureau
231-775-3960, Extension 6260

cc: Mr. Brian Myers, WB-Cadillac

Comment Letter 1652:

04 01652

STATE OF MICHIGAN

NIFER M. GRANHOLM
GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
LANSING

REBECCA A. HUMPHRIES
DIRECTOR

June 23, 2005

Ms. LeAnne Marten
Forest Supervisor
Huron-Manistee National Forest
1755 South Mitchell Street
Cadillac, MI 49601

Dear Ms. Marten:

The Department of Natural Resources (Department) has reviewed the Huron-Manistee National Forest Plan and has clarified Department comments made during our June 1, 2005 joint meeting in Roscommon. We appreciated the opportunity to meet with United States Forest Service (USFS) staff, to discuss the Plan.

Due to the spatial proximity and resource similarities between the Huron-Manistee National Forest (HMNF) and State Forests in the Northern Lower Peninsula (NLP), it is imperative that the USDA Forest Service and the Michigan Department of Natural Resources work collaboratively on land management issues. Further, resource management directions approved as a part of the HMNF Plan may have a large impact on nearby State Forest lands.

The first Forest Plan for the HMNF was issued in 1986. Regulation requires revision every ten to fifteen years. The revised Forest Plan was based on the alternative the Regional Forester chose (Alternative B), and is based on extensive analysis and considerations addressed in the "Final Environmental Impact Statement" which defines within legal requirements, the planning process and procedures used to develop the plan.

Highlights of preferred Alternative B:

- Increase Kirtland's Warbler Habitat to 135,965 acres. The 1986 plan had 109,000 acres.
- Restore 9,318 acres of Barrens and Savannahs in the 1st decade; 68,000 by the 5th decade. The 1986 plan restored 796 acres during the first decade.
- Five Management Indicator Species to reference wildlife and rare plant status. The 1986 plan had 16 indicator species.
- Prioritize treatment of non-native invasive species infestations; maintain lists; public education. The 1986 plan gave limited guidance.
- Harvest Aspen/Birch at a rate of 2,410 acres/year in the 1st decade, 2,800 by the 5th decade, and 2,410 by the 10th decade. This is the same as the 1986 plan except the10th decade had 2,000 acres.
- Allowable Sale Quantity: Increased to 910 million board feet (m.b.f.) for 1st decade, contingent on funding availability. Allowable sale quantity of 858 m.b.f. was not achieved during the 1986 – 1995 decade due to funding constraints.
- Streamside Management Zones (100') managed for late seral stages, with some allowance for early successional vegetation. The 1986 plan had riparian vegetation managed for late succession only.
- Designate 17,148 acres for semi-primitive motorized recreation; 64,397 acres for semi-primitive non-motorized recreation. The 1986 plan had 11,375 acres and 59,626 acres respectively.
- Create or maintain 2,000 acres of fuel breaks per year. Treat 8,000 acres of hazardous fuels per year. The 1986 plan gave little or no direction.

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Management of Timber Resources

- The Department and the Huron-Manistee National Forest has a successful history of working together in increasing the number of Kirtland's Warblers. While the plan calls for an increase of Kirtland's Warbler habitat by approximately 27,000 acres, much of this is from conversion of red pine to jack pine. The Forest Service may want to consider using species site suitability system (i.e. a Kotar plant habitat typing) to determine which sites are more suitable and productive for red pine over jack pine. There may be long term implications beyond the time frame of this plan for converting to a species (jack pine) that may not be best suited for the site.

- The new plan calls for an increase in the Allowable Sale Quantity (ASQ) to 910 m.b.f. from the 858 m.b.f. in the 1986 plan. However, it was recognized that the ASQ was not achieved during the 1986 plan due to inadequate funding. The inability to meet ASQ due to lack of adequate funding for timber sale operations is not addressed in the new plan. This comes at a time of increased demand on timber resources.

- Failure to meet ASQ is of particular concern with the aspen cover type where only 54% of the ASQ has been harvested since 1986 and 45,000 acres of aspen stands are over 50 years old. The planned 23% reduction in aspen/birch by the end of decade 4, under Alternative B, is already of concern to the Department.

- The conversion of forest to open lands planned for the Karner Blue Butterfly is agreeable and will provide an initial spike of timber products to the market, but it is recognized that it will result in a future reduction of timbered acreage. Since funding affects the operation of the Forest Service's regular timber sale operation, funding to harvest timber for this purpose is questionable.

- The scheduling of red pine stand replacement harvest and regeneration should be coordinated with the Department, which also has a skewed age class structure for red pine. The Department has analyzed the red pine resource for the state and is willing to work cooperatively with the Forest Service. This could help to alleviate any boom and bust cycle, and thus assure forest industry of a steady supply of red pine.

- The plan calls for an expected rotation age for red pine of 100 years which will produce a product of a size that is currently not desired by forest industry. The rotation age for red pine might better be decided according to the product being produced or according to habitat class. The overall trend has been toward shorter rotations for timber.

Fire Management

- The plan calls for creation or maintenance of 2,000 acres annually of fuel barriers and 8,000 acres of hazardous fuels risk reduction. We are not sure how these acreage amounts were determined, but it is recognized as a positive start toward a fire risk reduction plan for wild land/urban interface areas.

Recreation, Semi-primitive Areas and Access

- Demand for forest-based recreation has increased with population growth along with an increase of leisure time. The increase to 64,397 acres as semi-primitive non-motorized areas, and 17,148 acres of semi-primitive motorized areas works to meet the demand.

- By increasing acreages of motorized and non-motorized semi-primitive areas, the Forest Service is making an effort to address the increased demand for dispersed recreation. This may supplement existing inter-agency recreational efforts that address recreation demand in a cooperative manner (i.e. ORV trails, pathways, campground placement).

- The Department manages approximately 2,000,000 acres of forest land in the Northern Lower Peninsula (NLP), and the Huron Manistee National Forest manages approximately 1,000,000 acres. The Forest Service and the Department should cooperate on the development of management plans for this magnificent resource. Our goals and objectives are the same: to sustain the resource; to manage for bio-diversity; to provide recreational and economic benefit for current and future generations. To meet these goals and to get buy-in from our stakeholders, our agencies should cooperate on the planning and management of NLP forest lands. The Department and USFS roads and trails plan should be similar. Regulating commercial use of these resources should be the same. Our agencies should work toward common rules and regulations for these areas. The Pere Marquette River has Forest Service and Department access sites. Currently there are different rules regulating use of these sites. There should be one set of rules for public land in the river corridors.

Wildlife and Rare Plants

- Cover type and age class distributions from young early successional species to old growth ultimately dictates wildlife population levels, wildlife species diversity and rare plants associated with certain cover types and/or age classes. The planned 23% reduction in aspen/birch at the end of decade 4, which is proposed under Alternative B, will impact early succession wildlife species on the forest. This will impact hunting recreation on the HMNF and result in increased pressure for these resources on state-owned public land.

- Viable populations for some species are not attained by timber harvest and others require large-scale planning or other management needs in order for timber harvest to be beneficial. These issues need to be identified and addressed during the planning process.

- Additional indicator species could be added to address a wider variety of wildlife and habitat needs. Indicator species that use similar habitats, such as the brook trout and mottled sculpin, should be avoided. Given the diversity of terrestrial and aquatic habitat types in the HMNF, additional indicator species, similar to the 1986 plan, should be added.

- The list of natural landscape features (e.g. macrohabitat types) to restore and manage should include wetlands since there are numerous wetland communities on these lands that are important to special concern and other wildlife (e.g. bogs, fens, marshes, swamps).

- There should be some discussion on minimizing fragmentation. Fragmentation issues should be balanced against the need to maintain mosaics of habitats across the landscape. Since species respond differently to different mosaics, the desired conditions should provide for a variety of mosaic combinations. To provide for the majority of species, some mosaics should contain patches representing a variety of successional stages, while other mosaics should mostly represent contiguous habitat with small breaks such as wind throw, bogs, marshes, etc. The need for mosaics and the threat of fragmentation are issues that are prevalent for many species and require large-scale planning to provide for all necessary conditions (such as this one). Mosaics seem to be addressed but fragmentation isn't well addressed. These wildlife concerns are generally much easier to address on public lands than on private lands.

- The plan addresses the need for mesic grassland and discusses desired size, but it does not discuss the desired amount of mesic grassland and the distribution through the forest.

- The plan does not consider species site suitability i.e. a Kotar type habitat decision to determine which sites are ecologically best suited for aspen.

- It is recognized that the plan attempts to compromise between early successional forests for wildlife production and late successional forests for species diversity and rare plant habitats. Species diversity and rare plant habitats will be enhanced in old growth areas, wild and scenic river areas, research natural areas, experimental forests, candidate research natural areas, and wild and scenic study rivers.

Riparian and Aquatic Resources

- The plan recommends flexibility in managing riparian areas for either old growth or early successional species on a case-by-case basis, provided that aquatic resources will not be compromised. This is an improvement over the 1986 plan in that it allows both protection of the riparian resources while allowing habitat enhancement for early successional wildlife species of special concern.

- The Department has developed Best Management Practices (BMP) for water quality management practices on forest lands that contain guidelines for timber management within the riparian area. The current management plan supports a buffer width of 200 ft of late seral stages to discourage beaver activity in a riparian area. The proposed change generically approaches the topic of riparian zone management and references an update to guidance to change vegetation management within the riparian zone. The Department does not take issue with selective cutting within the riparian area, however we discourage large-scale management for early successional tree species within the 300 ft riparian zone near small (50 ft wide), high quality trout streams.

- We urge the USFS to continue to examine the number of roads in the Manistee and Huron National Forests. Road stream crossings are sources of sand and sediment and may create unnatural hydraulic conditions which can block fish passage. While we recognize that some roads are necessary for users to gain entry into the National Forests, the direct and indirect impacts of any new road construction on aquatic resources should be thoroughly evaluated before any new road construction proceeds. If existing roads are adversely affecting aquatic resources, appropriate corrective actions should be taken immediately.

- The Huron Manistee in the NLP contains several state designated Natural Rivers, including the Pine, Pere Marquette, White and Au Sable rivers. These rivers have individual written Management Plans that address a variety of management issues, including riparian vegetation, structures, public access, etc. The state designated status and management plans should be noticed in the updated Forest Plans

- The proposed USFS plan references compliance with the Wild and Scenic River Management Plans for these rivers, which would address most concerns on the federally designated portions of those rivers. However, only the mainstream of the Pere Marquette, part of the mainstream of the Pine and a 23-mile long section of the mainstream Au Sable are designated under the Federal program. Therefore, other referenced activities in the 'Streamside Management Zone (SMZ)" or riparian zone would affect hundreds of miles of mainstreams and tributaries that are designated State Natural Rivers but not designated Federal Wild and Scenic Rivers.

- The plan states that equipment use in the SMZ is allowed except in certain circumstances. It also refers to roads, skid trails and landing areas being allowed in the SMZ in certain circumstances. These allowances conflict with the Pine River Natural River Plan which states, "The use of wheeled, tracked or other heavy equipment is prohibited in the native vegetation buffer."

- The plan provides for a 300-foot setback from rivers for oil and gas extraction surface occupancy on federal leases. This is far short of the 1320-foot setback required in State leases. However, with site specific requirements, exceptions can be granted for leases on State lands. This section also has no required setback from wetlands.

- The desired levels of large woody debris as outlined in the plan in Table II-2 are conservative. Doubling of the suggested structure density is recommended. We are also concerned about the absence in the plan of the large woody material clearing width guideline for streams, which in the previous plan allowed for a maximum 8 foot swath to be cleared for boating purposes. Without this guideline, larger scale clearing is more likely, potentially resulting in degraded stream corridors.

- The Department routinely conducts surveys on lakes and streams within the forest boundaries. We are concerned that some of the activity restrictions and closures that may be in place to protect loon and eagle nesting will hamper our management efforts on these waters. We support the efforts to enhance these species, and we believe the likelihood of most fishing activity and our fisheries survey efforts to impact these species is negligible. We request that the plan include flexibility to allow for fishing and fisheries management activities to occur in these areas during the restricted periods.

- Since partnerships with watershed based organizations have become an effective method to accomplish watershed restoration goals, the Department recommends including an objective in the plan calling for continued participation in these watershed restoration partnerships.

In conclusion, this plan strives to balance the three pillars of ecosystem management (economic, social and biological). Its scope is comprehensive, stating the desired future condition, the formation of goals and objectives, management direction and monitoring. The plan is segregated into Management Areas that seem to be based, in part, on Land Type Associations. However there seems to be some reluctance to further stratify Management Areas by using habitat classification as a means of managing forest types. There also seems to be some tendency to manage forest types that are in place regardless of site suitability.

Sincerely,

Rebecca A. Humphries
Director
517-373-2329

Keith J. Charters
Chair
Natural Resources Commission

cc: Statewide Council
Mr. Dennis Fox, Chief of Staff, DNR
Mr. Dennis Fedewa, Chief Deputy, DNR
Ms. Mindy Koch, Resource Management Deputy, DNR
Ms. Lynne Boyd, DNR