

## **Appendix A**

### **Forest Plan Revision Issues and Public Involvement**



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# Appendix A



**Chequamegon-Nicolet  
National Forests**

## Appendix A

# Forest Plan Revision Issues and Public Involvement

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## Introduction

As a federal agency, the Forest Service is required to solicit public comment on draft plans involving significant actions under the National Environmental Policy Act (NEPA). Further, the agency is directed to “assess and consider [the resulting] comments both individually and collectively.” In addition, comments are viewed as critical in shaping a responsible plan for management of the Chequamegon-Nicolet National Forests that best meets the Forest Service’s mission, legal mandates, the goals of NEPA and the National Forest Management Act (NFMA), and the interests of the American public as a whole. During the formal comment period, the public reviewed and commented on the DEIS and draft forest plan’s alternative proposals for achieving the purpose and meeting the need for the proposed action to revise the 1986 Forest Plans.

This appendix includes a summary of public involvement activities and efforts made to engage the public in the forest plan revision process, a description of the formal public comment analysis and response to comment process, and a list of public concerns and our agency responses for the draft forest plan and draft environmental impact statement (DEIS). Also included is a list of the Federal, State, local agencies and elected officials who submitted comments. Copies of all documents received are available to the public at the Supervisor’s Office in Rhinelander, WI.

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## Public Participation

### Meetings, Open Houses, and Hearings

The Chequamegon-Nicolet National Forests began public participation events in 1995, when the first plan revision mailing list was developed. Between 1996 and 2003, private citizens became involved in the revision process through participation in public meetings and open houses, public hearings, and by sharing their ideas verbally or in writing throughout the revision effort. Throughout the revision process, over 1,600 people participated in a combination of 32 meetings, 31 open houses, and 4 hearings.

A chronological listing of all public involvement opportunities is below. More specific meeting information, such as meeting notes, sign-up sheets, presentations, and handouts is located in the official planning record at the Supervisor’s Office in Rhinelander, Wisconsin.

October 18, 1994 – The Forest Supervisor sent a letter to all Forest employees outlining an approach to the forest plan revision, including public involvement. The importance of working collaboratively and building relationships with people was emphasized.

April 1995 – Plan revision mailing list developed. Individuals on the Forest’s list to receive the quarterly Schedule of Proposed Actions were sent a form, which they were instructed to return if they wanted to be on the Plan Revision mailing list. In addition, the

Plan Revision core team sought input forest-wide for individuals who may be interested in being on the plan revision mailing list.

July 1995 – Revision topics were developed. A plan revision newsletter containing revision topics and a comment form was mailed to the plan revision mailing list. Open houses were held at each district and Forest office and in Madison, Stevens Point, and Green Bay, Wisconsin. The purpose of the open houses was to engage in one-on-one conversation with forest planners about the revision topics and to encourage participants to send in comments.

May 1996 – Public meeting held in Rhinelander for the purpose of developing a public involvement plan. The plan was prepared and mailed to members of the Plan Revision mailing list. Based on input, it was determined that plan revision public meetings would be held in Wausau on alternating Wednesdays and Saturdays during the day.

June 20, 1996 – The Notice of Intent (NOI) to prepare a Draft Environmental Impact Statement for the Chequamegon-Nicolet National Forests was posted in the Federal Register. A 60-day comment period followed. Letters and the NOI were sent to the plan revision mailing list encouraging the public to review the revision topics and comment on any new topics or the existing ones.

July and August 1996 – Open houses were held at 9 District Offices to provide information about the process of revising the Forest Plans and to gather public input on the scope of the decision to be made.

August 14, 1996 – Statewide public meeting held in Wausau. In attendance were 28 members of the public. The purpose of meeting was to review the revision topics and issues brought up in the Notice of Intent to revise the forest plans.

December 1996 – Content Analysis of public comments on the Notice of Intent to Revise the Forest plan is completed. The forest received 188 responses. A newsletter mailed to the plan revision mailing list summarized the analysis of public comments and the availability of the Content Analysis report.

February 8, 1997 – Statewide public meeting held in Wausau. A plan revision newsletter and letter of invitation from the Forest Supervisor dated October 9, 1996 was sent to the plan revision mailing list. The purpose of the meeting was to share the preliminary Analysis of the Management Situation documents. Approximately 144 individuals attended this meeting.

July 15, 1998 - Statewide public meeting held in Wausau. A letter of invitation was sent to the plan revision mailing list on June 12, 1998. The purpose of the meeting was to provide a brief planning update, info on how to obtain revision documents (including those available on the web), a brief overview of the planning and decision criteria, an overview of GPRA, NRA, and the development of the roads policy. There were 56 attendees at this meeting.

August 29, 1998 - Statewide public meeting held in Wausau. A letter of invitation was sent to the plan revision mailing list on August 6, 1998. The purpose of the meeting was to provide a more detailed overview of the decision criteria, planning criteria and the End of Decade report. There were 49 attendees at this meeting.

March 31, 1999 – Statewide public meeting held in Wausau. A letter of invitation along with meeting materials was sent to the plan revision mailing list on March 15, 1999. The purpose of the meeting was to discuss management problems derived from the preparation of the Analysis of the Management Situation, and to introduce a proposed

process for the development of alternatives. A total of 124 individuals attended this meeting.

May 1999 – A series of local public meetings were held in Clam Lake, Park Falls, Florence, Wabeno, Ashland, Spider Lake, Medford, and Eagle River. A letter of invitation was sent to the plan revision mailing list on April 22, 1999. The purpose of the meetings was to present the information shared at the March 31, 1999 statewide meeting held in Wausau. A combined total of 246 individuals attended these meetings.

May 22, 1999 – Statewide public meeting held in Wausau. An updated letter of invitation and the meeting agenda was sent to the plan revision mailing list on May 13, 1999. A previous letter, containing an incorrect meeting location, was sent on April 22, 1999. The purpose of the meeting was to share the progress made on the development of draft management area prescriptions and draft conceptual alternatives. Fifty people attended this meeting.

June 1999 – A series of local meetings were held in Medford, Clam Lake, Park Falls, Eagle River, Wabeno, Florence, Spider Lake, and Ashland. A letter of invitation was sent to the plan revision mailing list on May 27, 1999. The purpose of the meeting was to present the information shared at the May 22, 1999 statewide meeting held in Wausau. A combined total of 123 individuals attended these meetings.

June 30, 1999 – Statewide public meeting held in Wausau. A letter of invitation was sent to the plan revision mailing list on June 18, 1999. The purpose of the meeting was to share and discuss land allocations by alternative, the range of solutions to address problem statements, how each alternative addresses the problem statements, and draft forest-wide standards and guidelines. There were 63 attendees at this meeting.

July 1999 – A series of local meetings were held in Medford, Clam Lake, Park Falls, Eagle River, Wabeno, Florence, Spider Lake, and Ashland. The purpose of the meeting was to present the information shared at the June 30, 1999 statewide meeting held in Wausau. A combined total of 76 individuals attended these meetings.

November 2002 – A Plan Revision Newsletter and post card was sent to the plan revision mailing list requesting it be returned with information on how individuals would like to receive the Proposed Plan and Draft Environmental Impact Statement (DEIS).

April 7, 2003 – Copies of the Proposed Plan and DEIS were mailed to individuals requesting them. The Plan and DEIS were also posted on the Forests' web site. A Planning newsletter was sent to the plan revision mailing list announcing the availability of the Proposed Plan and DEIS. A schedule of upcoming open houses was also included.

April 11, 2003 – The announcement of the availability of the Proposed Plan and Draft Environmental Impact Statement was posted in the Federal Register. A 3-month comment period began.

May and June 2003 – Open houses were held in Laona, Florence, Eagle River, Ashland, Hayward, Park Falls, and Wausau. The purpose of the open houses was to give individuals the opportunity to speak to forest specialists, see displays, maps, and documents, ask questions about the Proposed Plan and DEIS, and submit written comments. A combined total of 250 individuals attended, with 70 of them submitting written comments at the meetings.

June 24 and 25, 2003 –Public hearings were held in Rhinelander and Park Falls. The purpose of the public hearings was to enable individuals to comment orally on the

Proposed Plan and DEIS. Of the 64 that attended, 34 individuals provided oral comment, which was recorded by a transcriber, and 10 submitted written comments.

July 2003 – The comment period was extended to August 11, 2003 and published in the Federal Register. Additional public open houses and hearings were scheduled during the extension period. A flier was sent to the plan revision mailing list announcing the new meeting locations on May 1, 2003. Public hearings and open houses were held in Waukesha, Madison, and Eau Claire. Of the 168 that attended, 65 provided oral comments, which were recorded by a transcriber, and 65 submitted written comments (some written comments were duplicates of testimony).

## **Plan Revision Newsletters**

In addition to letters informing the public of upcoming meetings, the Chequamegon-Nicolet National Forests has mailed 13 Plan Revision Newsletters that conveyed a variety of information. Newsletters were sent throughout the plan revision process for a period from June 1995 until July 2003. A list of plan revision newsletters and their contents is below. The newsletters are available in the official planning record located in the Supervisor's Office in Rhinelander, Wisconsin.

June 1995 – Newsletter included revision topics, information about why it was time to revise the plans, and dates of upcoming open houses. A comment form was also included with the newsletter for those who chose to comment on the revision topics.

December 1996 – Newsletter included summaries of the Content Analysis Report based on comments received following the issuance of the Notice of Intent to Prepare a Draft Environmental Impact Statement.

September 1997 – Newsletter included an update of plan revision activities related to the development of Forestwide Standards and Guidelines, the Analysis of the Management Situation, and the decision criteria. It also contained an update on the February 7, 1997 public meeting, an overview of laws and regulations that must be followed when revising forest plans, and information about how the public can best frame comments they send to the forest.

November 1998 – Newsletter included a general plan revision update, a summary of information shared and comments received at two public meetings held in July and August 1998. This was also the first newsletter informing the public of the availability of planning documents on the Chequamegon-Nicolet web site.

October 1999 – Newsletter included a general planning update, information on the proposed Planning Rule, ongoing development of Forestwide Standards and Guidelines, Species Viability Evaluations (referred to as Population Viability Assessments), Wilderness Evaluations, and the beginning of effects analyses.

June 2001 – Newsletter contained an progress update of continuing work on Species Viability Evaluations (referred to as Population Viability Assessments), Wilderness Evaluations, Alternative development, effects analyses, and plan monitoring. A form was also included in the newsletter for those who: 1. Wish to have their names removed from the plan revision mailing list, and 2. Wish to receive further planning information via e-mail.

February 2002 – Newsletter contained a general planning update and a new "In-Depth" section that discussed what kinds of decisions are made in forest plans.

April 2002 – Newsletter contained a general planning update and an “In-Depth” section that discussed Management Areas as they relate to forest planning.

July 2002 – Newsletter contained a general planning update and an “In-Depth” section that discussed the Wilderness Inventory and Evaluation process.

September 2002 – Newsletter contained a general planning update and an “In-Depth” section that discussed existing ATV and ORV policies on the forest, and the amount of ATV and ORV use in the range of alternatives.

November 2002 – Newsletter contained a history of the plan revision process, and the tentative dates of release of the Proposed Forest Plan and Draft Environmental Impact Statement. A postcard was also sent with this mailing asking individuals how they would like to receive the Proposed Forest Plan and DEIS documents.

April 2003 – Newsletter contained information on the availability of the Proposed Forest Plan and DEIS for review and comment and the dates of the comment period. It included a brief summary of the contents of the documents, how to obtain them, and where they can be reviewed. The schedule of upcoming open houses and hearings, how to comment on the Proposed Forest Plan at these forums, how comments would be analyzed, and how to submit comments were also in this newsletter.

July 2003 – Newsletter contained the notice of the extension of the comment period, an update on the first set of open houses and hearings, a notice of additional scheduled open houses and hearings, as well as why and how to comment and where the plan revision documents were available for review.

## **Plan Revision Website**

Plan Revision information and documents have been posted on the Chequamegon-Nicolet National Forests website (<http://www/fs/fed/us/r9.cnnf/>) since 1998. A Plan Revision “Reading Room” was developed that contained documents and information made available to the public via meetings and mailings. Plan Revision information was placed on the Forest web site concurrent with the dates of meetings and mailings. Individuals were also given the opportunity to receive planning information and documents via e-mail as opposed to mailing of hard copy documents.

## **Media Contacts**

The Chequamegon-Nicolet National Forests have maintained media contact lists for facsimile and e-mail notifications of News Releases pertinent to plan revision activities. There are over 85 contacts on these lists, which reach outlets throughout Wisconsin and major cities in Minnesota. Newspapers, and television and radio stations have interviewed the Forest Supervisor, Public Affairs Officer, and members of the planning team throughout the process.

## **Legislative Contacts**

The Chequamegon-Nicolet National Forests have maintained close contacts with legislative officials throughout the plan revision process. The Forest Public Affairs Officer has kept them informed through the utilization of a weekly Legislative Update, as well as phone contacts when needed. At different junctures in the process, the Forest has met with legislators providing them with timely plan revision information. All legislative officials' offices are also on the plan revision mailing list.



## Consultation with County Governments

In 2001, a Charter was developed establishing the “Wisconsin County – Chequamegon-Nicolet National Forest Forest Plan Revision Committee.” The primary purpose of the Committee is to facilitate the coordination among counties and the Chequamegon-Nicolet National Forests on issues associated with the Forest Plan revision efforts.

Members of the Committee are the County Forester and one Board member from each participating county, the Executive Secretary of the Wisconsin County Forestry Association, the Deputy Forest Supervisor, and the Forest Planning Staff Officer from the Chequamegon-Nicolet National Forests. The Committee established an Executive Committee to facilitate coordination among the counties and the Forest. An Executive Committee was established for the purpose of having a group that was small enough for efficient discussions and that could meet often enough to stay fully engaged with all aspects of plan revision.

## Consultation with the Wisconsin Department of Natural Resources

In August 1996, the Secretary of the Wisconsin Department of Natural Resources (WDNR) established the National Forest Plan Steering Team, which was chartered by the State Forester. Since that time, the Chequamegon-Nicolet National Forests have met several times with this Steering Team as well as with other State natural resource specialists. The WDNR also submitted written correspondences to the Forest throughout plan revision, as well as during the official comment periods for the Notice Of Intent and the draft Forest Plan and EIS.

## Consultation with the Board of Commissioners of Public Lands

The Board of Commissioners of Public Lands (BCPL) is Wisconsin’s oldest state agency, created in 1848 to deal with millions of acres of Trust Lands granted to the state by the federal government. Forest Service Planners participated in several meetings with employees of this agency at Tomahawk, WI. The BCPL shared concerns verbally, on maps and submitted written comments on the Proposed Plan and DEIS. The September 30, 2003 document named, “Documentation of Discussions based on Comment Submitted Board of Commissioners of Public Lands” in the planning record provides detail of Forest Service considerations based BCPL comments.

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## The Analysis of Public Comment

All letters, e-mails, faxes, comment forms, and transcripts of public hearing testimony received as public comment on the Proposed Forest Plan and DEIS were compiled, organized, read, and analyzed by the U. S. Forest Service Content Analysis Team (CAT). This team, a unit of the Washington Office Ecosystem Management Coordination branch, specializes in innovative approaches to public comment processing and consideration. This team uses a process they have developed called “content analysis” which allows systematic review of public comment on a proposed plan or project through the creation and use of a comprehensive electronic comment database. This method is particularly effective in analyzing voluminous comment both individually and collectively, as required by NEPA.

The CAT analytical process is comprised of three main components: a topical **coding structure** and standardized process for its application, a comment database and mailing list, and a set of summary reports. In the content analysis process, each letter, postcard,



transcript text, or other document (collectively referred to as “**response letters**” in this appendix) is assigned a unique tracking number. Each author or signatory to a response is called a “**respondent**.” All respondents’ names and addresses are entered into a project-specific database program to produce a complete mailing list. Each respondent is also assigned a unique identifier number for tracking purposes. All respondents are linked to their individual responses and comments in the database using these identifying numbers. Project-specific demographic information is also recorded in the database, such as any self-identified organizational affiliation or whether the response letter submitted is part of an organized response campaign.

Staff analysts then read all public response letters in their entirety and proceed to identify discrete **comments** within them that relate to a particular concern, resource consideration, or proposed management action. Every effort is made to keep each comment within sufficient context that it is a stand-alone statement. Analysts look for not only each action or change requested by the public, but also the reason(s) behind each request in order to capture the full argument of each comment. Therefore, paragraphs within a response letter may be divided into several comments because multiple arguments are presented, or alternatively, several paragraphs that form one coherent statement may be coded into one comment. While simple statements of opinion without a rationale are captured in the process and entered in the project database, it is the strength of each rationale as a complete argument that provides the interdisciplinary team a substantive comment to consider.

Once stand-alone comments are identified, analysts assign each comment to a numerical code that identifies the overall subject area. They use a systematic numerical categorization, or coding structure, that has been specifically tailored to project documents. Each project-specific coding structure is a tool to help sort comments into logical groups by topics. The coding structure and other supporting documentation is available in the administrative record at the Supervisor’s Office in Rhinelander, WI.

After being coded, each response letter’s set of coded comments is entered verbatim into the project database. This database serves as the complete project record and allows analysts and planning team members to run specialized reports, identify public concerns, and determine the relationships among them.

The content analysis process also identifies response letters that are submitted as part of an organized response (or “form letter”) campaign and therefore contain identical text. These are grouped by campaign, and all mailing information for each respondent is entered into the project database, as well as an identifier code for the campaign. Analysts also code a master campaign letter and enter all comments verbatim into the project database so that they are considered alongside all non-campaign comments. If respondents add original comments to the organized response letter they submit, these comments are identified, separately coded, and entered into the database.

The third phase of content analysis includes the composition of summary statements of **public concern** and the preparation of a narrative report. Analysts review the entire comment database sorted by topic area, and then write public concerns to summarize comments that present similar arguments or positions. Each public concern is worded to capture the action that one or more members of the public feel decision-makers should take, and often includes a phrase or clause that indicates the reason for this request. Because each concern statement is a summary, it can represent one or many comments, depending on the actual comments submitted. Concern statements range from extremely broad generalities to extremely specific points because they reflect the content of

verbatim public comments. A selection of supporting verbatim comments from the public are then organized under these public concern statements so that reviewers can read the full rationale underlying each public concern. Each sample excerpt is linked back to the complete original response using the response identification number listed with the comment.

However, due to space limitations for publication of this volume, the sample comments have been deleted from each concern statement and replaced with the agency responses. The full Content Analysis Team report is in the administrative record at the Supervisor's Office in Rhinelander, WI. At times responses include reference to information in example comments. If more information is desired, the full report, *Analysis of Public Comment* (USDA Forest Service October, 2003) is in the planning record.

Public concern statements are not intended to replace actual comment letters or sample quotes. Rather, they can help guide reviewers to comments on the specific topic in which they may be interested. They also make it possible to systematically respond to large numbers of comments because similar comments have been grouped together. The Forest received 2,941 comments during the 4-month comment period. All original response letters in their entirety are on file at the Supervisor's Office in Rhinelander, WI.

Once the comments have been exhaustively reviewed and the public concerns identified, interdisciplinary team members, who are responsible for the next stage of comment consideration, issue identification and response to comment, review the List of Public Concerns. At this stage, interdisciplinary team members and decision-makers determine whether comments are substantive and in scope and arrive at decisions about whether changes will be made to forest plan direction, alternatives, supporting analysis, or other plan elements. Finally, team members compose responses to comment, and changes are also incorporated into the final Forest Plan and FEIS as appropriate.

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.

Therefore, consideration of public comment is not a vote-counting process in which the outcome is determined by the majority opinion. The National Environmental Policy Act (NEPA) encourages all interested parties to submit comment as often as they wish regardless of age, citizenship, or eligibility to vote. Respondents may include businesses, people from other countries, children, and people who submit multiple responses. Also, many people submitted more than one response letter over the course of the 4 month comment period, and these letters often contained very similar but not identical content. Analysts did not attempt to tabulate the exact number of people in favor of or opposed to any given aspect of the draft forest plan and DEIS.

The narrative report below does include very general indications of the strength of public feeling found in the comment database for informational purposes. However, these comparatives must be taken as more qualitative than quantitative in nature. Although these qualifiers give a general sense of public sentiment, they should be interpreted with caution—those who responded do not constitute a valid random or representative sample of the general public.

The final CAT reports are summary documents. As such, they are not intended to replace the need for interdisciplinary team members and decision-makers to directly review all responses and comments. Database reports by topic area allow systematic review of all public responses by subject area. Given the rapidly expanding volume of responses during comment periods due in part to increasing public interest in public lands management issues and the widespread use of e-mail, this process can greatly enhance methodical review of comments and meet our goal to continually improve decision-making and responsiveness to the public. For more information on the content analysis process, the reader may contact the Forest Service Content Analysis Team in Salt Lake City, Utah.

## **Considering Different Types of Comments under the National Environmental Policy Act**

Agencies have a responsibility under the National Environmental Policy Act (NEPA) to first “assess and consider comments both individually and collectively” and then to “respond... stating its response in the final statement.” The content analysis process used by the Content Analysis Team (CAT) considers comments received “individually and collectively” and equally, not weighting them by the number received or by organizational affiliation or other status of the respondent. Public concern statements and supporting quotes from public input form the basic summary of public comment and were the primary focus of our interdisciplinary team in considering comments.

The National Environmental Policy Act requires that after comments are considered, the Forest will formally respond to substantive comments. However, the nature and extent of each response depends on the type of concern identified.

Comments, or the concerns identified from them, were classified as either those that fall within the scope of decision-making for the plan revision or those that fall outside of the scope for any number of reasons described below. Counsel on Environmental Quality (CEQ) regulations define “scope” and require the Chequamegon-Nicolet National Forest to explain why comments are determined out of scope.

Generally, the scope of the plan is 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.

If a concern was considered out of scope, an explanation is included in this document. Generally, the types of comments received, and concerns identified, that were considered out of scope include those that:

1. Do not address the purpose, need, or goals of the Chequamegon-Nicolet National Forests 2002 Forest Plan Revision (e.g. propose an action in areas beyond Chequamegon-Nicolet National Forests jurisdiction or that are not directly related to the action proposed in the plan, or relate to day-to-day operational issues such as law enforcement procedures or road maintenance);
2. Address concerns that are already decided by federal law or national policy;
3. Suggest an action not appropriate for the current level of planning (site-specific decisions to construct new roads, campgrounds or facilities, to offer special use permits or the sale of timber resources);

4. Propose untenable restrictions on management of the Forests or conflict with approved plans not being revised in the Forest Plan revision process;
5. Did not consider reasonable and foreseeable negative consequences; or
6. Point to only minor editorial corrections.

The Chequamegon-Nicolet National Forests further classified comments within the scope of the plan as either substantive or non-substantive. Based on the Council of Environmental Quality's regulations, a substantive comment is one that:

1. Questions, with a reasonable basis, the accuracy of the information in the environmental impact statement;
2. Questions, with a reasonable basis, the adequacy of environmental analysis as presented;
3. Presents reasonable alternatives other than those presented in the DEIS that meet the purpose and need of the proposed action and address significant issues; or
4. 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.

The Chequamegon-Nicolet National Forests are required to respond only to substantive comments or the concerns identified from them. However, to fully inform the public and to use this process as an educational tool, the Forest has chosen to respond to all public concerns identified during analysis of public comment, within and out of scope, substantive and non-substantive alike. Responses to out of scope concerns are generally restricted to describing why the concern is out of scope and does not merit further attention. A more elaborate answer may have been provided for clarity. Responses to substantive concerns are typically more extensive, complete, and most importantly, offer an explanation of why or why not and where the concern may have resulted in changes to the plan or analysis. If several concerns are very similar, they have been grouped for response purposes. Public concerns that identified editorial or other errors in the presentation of information in the DEIS were used to revise text and make corrections for the FEIS.

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## **Narrative Summary of Public Comment prepared by CAT**

### **Planning Process and Purpose and Need**

Americans depend on the National Forest System to meet many different needs, including recreation, clean water, ecosystem services, and livelihood. The burden on the Forest Service is to balance competing, sometimes conflicting needs—no easy task. Forest planners must carefully measure decisions while juggling congressional mandates and laws, executive branch pressures, and the demands of a polarized American public. While balancing these demands, the Forest Service must maintain its own sense of professionalism, esprit de corps, and the health of these public lands.

The public debate over the management direction of the National Forests is often polarized between those who feel the forests should be managed for economic benefit, and those who feel the forests should be managed to preserve and restore ecosystems and

protect forest species. This polarization is manifest in the comments received regarding the Chequamegon-Nicolet National Forests proposed Forest Plan. Some who respond to the Draft Environmental Impact Statement (EIS) and proposed Forest Plan state that resource extraction has been the priority in the past, at the expense of ecosystem health and sensitive species. They suggest restricting resource extraction and road building, and ask the Forest Service to preserve and restore the Chequamegon-Nicolet National Forests' ecosystems. Others comment that the goal of ecosystem restoration is an attempt to return the Chequamegon-Nicolet National Forests to pre-European conditions, which they assert is impossible and should not be pursued. The Forest Service, these respondents say, would have to bring populations, transportation, living conditions, pollution, and technology back to pre-settlement levels, depriving those that live near the Chequamegon-Nicolet National Forests of their economic use of and motorized enjoyment of the forest.

Diverse respondents are united by their suspicion that the Forest Service is favoring one group over another, or bending to political pressures. Some state that the Forest Service is caving in to timber industry pressures to open more land for logging and to provide the public subsidies that go along with below-cost timbers sales. Further pressure, they assert, is coming from the Bush Administration, which they allege sees opening the land to logging as quid pro quo for campaign contributions. This, they say, will increase logging company profits at the expense of ecosystem health and future generations' enjoyment of the forest. Further, some respondents see a well-financed off-highway vehicle (OHV) industry pulling strings with the Forest Service to open more areas to all-terrain vehicle (ATV) use. On the other hand, some respondents see the Forest Service as pandering to environmental groups by "locking up" the forest through restrictions on motorized access and timber harvest. They feel active management and full access to the forest is necessary for forest health, the viability of the local economy, and recreation.

Some respondents are concerned that the Forest Service did not make adequate efforts to involve the public in the planning process. The Chequamegon-Nicolet National Forests states that it attempted to contact 2,000 groups and individuals, inviting them to participate in the comment period, but some groups felt left out. For example, a snowmobile group asserts that they are being excluded from the planning process because of the summer comment period—off-season for snowmobiling. The club asks that a comment period be held during the winter months when snowmobilers are more easily reached. Some respondents from southern Wisconsin felt neglected initially, when no public meetings were scheduled in their area.

Some respondents who reside near the Chequamegon-Nicolet National Forests are concerned that the Forest Service has not involved local governments in the planning process. They ask that the Forest Service consult with the local counties on management issues, as they say was promised them when the Chequamegon and Nicolet National Forests were first created. Some local respondents ask that individuals with local, on-the-ground experience analyze the public comment.

Respondents have some suggestions for better use of science in the Forest Plan. One respondent reminds the Forest Service to use the regional gap analysis called for by the Scientific Roundtable (Crow *et al.* 1994) to extend adequate protection and restorative management to the areas identified. Another respondent is concerned that the Forest Service is ignoring advances in ecology and conservation biology, and reminds the Forest Service to use the most up-to-date science available during the planning process. Finally, a respondent suggests the use of geographic information systems (GIS) tools to assist in the complex process of species viability planning.

Some respondents question the content of the document itself, as well as certain analyses within the document. One writer asks for the insertion of tables showing the distribution of forest types across the spectrum of management areas, and the overlap of common areas between management areas, in order to clarify how management areas work. A county government asserts that it has requested information regarding potential timber outputs versus the allowable sale quantity (ASQ) reductions resulting from management constraints. The Draft EIS does not contain this information, and the county suggests that the Final EIS address the lack. Another respondent asks the Forest Service to include sub-plans in the Forest Plan to better address the differing conditions and physical separation of the forest units, and avoid one-size-fits-all direction.

Inadequate staffing and funding levels for the Forest Plan forestalling implementation is the concern of one respondent. Whether establishing timber sales, enforcing new ATV policies, committing to barrens management, decommissioning roads, or monitoring, the respondent asks the Forest Service to secure the necessary resources to carry out these missions.

Inadequate law enforcement is a concern of some respondents. One letter writer asks that the Forest Plan include a strong law enforcement program to protect the forest from illegal tree-cutting and illegal OHV use. To fund law enforcement activities, another respondent suggests imposing fees on forest users.

## **Consideration of Alternatives**

Respondents raise a number of concerns regarding the range of alternatives, analysis of alternatives, and desired alternatives. Regarding analysis of alternatives, some respondents argue that the Chequamegon-Nicolet National Forests needs to (or needed to) conduct a thorough benchmark analysis before beginning development of alternatives. Some respondents request that each alternative be compared with the range of natural variation. Some respondents aver that the Final EIS should analyze the impacts of each alternative on game species, while others argue that the social and economic impacts of each alternative on local communities need to be better examined.

Some respondents feel that no alternative considered was adequate, and suggest that each alternative should better promote “multiple use” (meaning extractive industry and motorized recreation, in most respondents’ lexicon). Some citizens suggest that the Final EIS provide direction for the recovery and viability of regional forester sensitive species in each alternative. Some respondents suggest that each alternative benefit old growth dependent species. Some respondents argued that the range of alternatives was inadequate, suggesting that timber harvest levels in each alternative are relatively similar.

Many respondents have suggestions for new alternatives which they believe should be considered and selected. Suggested new alternatives related to conservation and non-motorized recreation include: a roadless restoration alternative; a Conservation Alternative; alternatives that designate Research Natural Areas; an alternative with large blocks of Management Area 2B; alternatives that identify quantifiable objectives for managing sensitive species; alternatives that incorporate programs that monitor distribution, status, and trends for all threatened, endangered, and sensitive species; an alternative preserving 200,000 to 300,000 acres of old growth; alternatives that do not promote the persistence and spread of noxious weeds through additional roads and OHV route construction; alternatives that meet the needs of both early and late successional species; alternatives that emphasize interior forest restoration; an alternative prohibiting timber harvest; alternatives that restrict logging to when the ground is frozen; an

alternative that prohibits motor vehicle use off road; alternatives that strictly limit OHV use; and an alternative that restricts additional road construction.

Suggested new alternatives that deal with game include: alternatives that require aspen harvest and rotation to benefit elk; alternatives that manage habitat to reduce deer populations; and an alternative that protects browse-sensitive understory plant species.

Suggestions relating to logging and motorized recreation include: an alternative that does not recommend any wilderness study areas; alternatives that fulfill the commodity production goals articulated for the Chequamegon-Nicolet National Forests when it was established; alternatives not limited by the Report of the Scientific Roundtable; alternatives that address insect control; alternatives proposing an increase in timber harvest; alternatives that address harvest levels and silvicultural treatments necessary for forest health; alternatives that promote aggressive hardwood management; alternatives that expand OHV access; and alternatives that emphasize multiple use.

### **Alternatives 1, 2, 4, 6, 7, 9**

Many respondents identify the alternative they feel would represent the best preferred alternative and a fair number suggest combinations of several alternatives. Every alternative in the Draft EIS is addressed by at least one respondent. In many instances, however, while the reasons for supporting, opposing, or urging modification of an alternative are well articulated, and should be reviewed, the proposed management action is best summarized in very short form.

Some respondents support adoption of Alternative 1, while some oppose it.

Some respondents advocate adoption of Alternative 2, sometimes depending on modification, while at least one respondent argues for utilizing Alternative 2's semi-primitive, non-motorized designations regardless of which alternative is adopted.

Alternative 4 is suggested for adoption, sometimes depending on certain conservation- or non-motorized recreation-oriented modifications, such as more wilderness and a prohibition on new OHV routes.

Similarly, Alternative 6 is nominated for adoption, sometimes depending on more non-motorized designations.

Alternative 7 is also suggested for adoption.

Some respondents argue for adoption of Alternative 9, and some request that it be modified in conservation-oriented fashion. One respondent asks for additional explanation of the analysis of Alternative 9 impacts.

### **Alternative 3**

Functionally the conservation and quiet recreation alternative, Alternative 3 is the subject of a lot of interest. Comments include suggestions that Alternative 3 be adopted as is, and a number of suggestions for modification prior to adoption. Suggestions include prohibiting logging in Management Area 6A and/or on 400,000 acres of the Chequamegon-Nicolet National Forests, and protecting 15,000 to 20,000 acres of forest as wilderness. Some respondents suggest modifying Alternative 3 to reduce road densities and prohibit road construction and logging in old growth areas; others suggest it be modified to increase water protection, reduce deer populations, and prohibit logging in sensitive species' habitat. At least one respondent suggests modifying Alternative 3 by prohibiting OHV use on the Nicolet and restricting OHVs on the Chequamegon under a



“closed unless marked open” policy. Respondents request adoption of Alternative 3 with protections for corridors around the Ice Age and North Country Trails, and with recommendations for wilderness designation of all RARE II areas.

Respondents also request clarification of the Draft EIS analysis of Alternative 3’s potential timber production.

## **Alternative 5**

Not surprisingly, comment on Alternative 5, the Preferred Alternative, is extensive. Numerous respondents suggest adopting Alternative 5, characterizing it as “reasonable,” and “a good compromise.” Alternative 5 also takes criticisms from numerous quarters, such as those who believe it “favors extreme environmentalism over sustainable use.” Some criticize the Preferred Alternative for inadequately providing for aspen and early successional habitat (and game species). Some respondents argue that Alternative 5 fails to adequately provide for ecosystem preservation, protected areas, and non-motorized recreation.

Criticisms of Alternative 5 are reflected in suggestions for its improvement. Respondents ask that the Preferred Alternative better protect wilderness, pine and oak forests, old growth, riparian areas, and non-motorized areas. Respondents suggest increased use of Alternative Management Areas and Ecological Reference Areas to accomplish these goals. Respondents also ask that Alternative 5 incorporate increased road densities and OHV use, increased logging, and increased early successional habitat.

## **Affected Environment**

### **General Environmental Values**

Many respondents call for a Forest Plan that focuses on protecting and restoring ecosystems, and the species dependent on these ecosystems, through a management scheme that involves maintaining a diverse range of systems and successions within the forest. These citizens assert that in an era of overpopulation, pollution, overuse, and misuse of natural resources the Forest Plan must preserve and protect the Chequamegon-Nicolet National Forests. Further, the Forest Plan should set aside undisturbed areas so natural cycles may take place as nature intended. A management scheme that focuses on timber sales will benefit the short-term profits of the logging industry, but damage resources in the long-term through water pollution, loss of habitat, and a decline in tourism and land value, some respondents assert.

### **Soils**

Respondents ask the Chequamegon-Nicolet National Forests to limit impacts to soils. One respondent provides a list of requirements the Chequamegon-Nicolet National Forests should use during management actions involving soil disturbances: maintain adequate ground cover and soil organic layers, both during and after treatment, to minimize erosion and allow water back into the soil; minimize soil displacement, nutrient loss, and effects of severe burning; restore and re-vegetate disturbed areas; and protect soil-hydrologic functions by minimizing rutting, puddling, and compaction. Other respondents suggest protecting soils by simply limiting mechanized use of the forest, and by prohibiting clear-cutting.

## Pollution

Several respondents address air, water, and noise pollution relative to the Forest Plan. One individual describes the emissions from OHVs and how these emissions contribute to air pollution and global warming. This writer asks forest planners to calculate the environmental pollutants and greenhouse gasses emitted from OHVs on the Chequamegon-Nicolet National Forests then minimize these uses accordingly. Another respondent brings up noise pollution and its causes, ranging from ATVs to camp generators, and asks the Chequamegon-Nicolet National Forests to control or remove these noise sources from the forest.

The wood products industry lists the environmental benefits of using wood as a structural material. Wood, the industry says, is not only a renewable resource, but is significantly less polluting in emissions and effluents than other structural materials such as aluminum, plastic, concrete, and steel. Therefore, timber harvest is necessary to reduce pollution in the air and water over the long term.

## Aquatic Resources

Many respondents ask the Chequamegon-Nicolet National Forests to provide the greatest protections possible for aquatic resources. An environmental group provides an extensive list of standards and guidelines that it believes would ensure watersheds and their components remain healthy and productive. These proposed standards and guidelines range from ensuring adequate water-flows from watersheds, to maintaining and restoring hydrologic connectivity, to restricting development on flood plains.

Many respondents ask the Chequamegon-Nicolet National Forests to establish a much higher level of protection for river corridors, stream corridors, and ponds. Some suggest buffers of up to 500 feet for rivers, and 100 foot buffers around ephemeral ponds. Forest buffers along trout streams, according to one respondent, should exclude aspen monoculture and encourage long-lived conifers. This management is necessary, these writers say, to prevent beavers from converting these streams to warm, slow moving water courses. Counter to this, one writer asks for more aspen management along waterways to ensure the viability of species dependent on this early successional forest type.

Management activities within wetlands have raised some comment. The Wisconsin Department of Natural Resources (WDNR) would like to see wetlands management evaluated on a site-by-site basis. Lowland status, states the WDNR, should not exclude a forest stand from timber harvest; many wetlands may require timber harvest for regeneration. Another respondent asks for wetlands to be excluded from the suitable timber base, arguing that forested wetlands are slow growing, especially in bogs, and timber harvest in wetlands will cause more harm than logging comparable upland stands. A conservation organization has observed stream damage to wetlands within the Chequamegon-Nicolet National Forests from road crossings, skid trails, slash disposal and log landing. This organization suggests standards and guidelines to better protect and restore these areas. Standards and guidelines this group offers include restricting sewage disposal, protective guidelines for road building during frozen conditions, and protective guidelines for constructing utility rights-of-way through these sensitive areas.

## Biological Diversity

Some respondents remind the Forest Service that the Chequamegon-Nicolet National Forests are obligated to preserve and enhance the diversity of plant and animal

communities. The Chequamegon-Nicolet National Forests, states these respondents, are home to many threatened and sensitive species, such as the Canada lynx, red-shouldered hawk, and goshawk. Careful land management offers the best hope for these species' future. Further, some respondents ask the Chequamegon-Nicolet National Forests to maintain biological diversity by providing a range of successional stages, including pine barrens and old growth.

### **Fish and Wildlife**

Many respondents ask the Chequamegon-Nicolet National Forests to make habitat protection a priority. Some suggestions include creating no-disturbance zones around known nesting areas, establishing connecting corridors between wildernesses and river corridors, and establishing large areas with abundant coarse woody debris and standing snags. A conservation group, impressed by the goals and objectives for fish and wildlife management proposed by the Chippewa National Forest, recommends them as a starting point and a significant improvement over those in the Chequamegon-Nicolet National Forests proposed plan.

Some respondents are concerned that human activities put more and more pressure on fisheries and ask the Chequamegon-Nicolet National Forests to conduct more fish habitat improvement projects, emphasizing heavily-fished areas.

Many respondents view the Chequamegon-Nicolet National Forests as crucial habitat for sensitive bird species, especially migratory birds and raptors. These respondents see the Chequamegon-Nicolet National Forests as able to set bird recovery objectives that other areas cannot. One respondent asks the Chequamegon-Nicolet National Forests to manage for varied successional stages to provide habitat for the wide range of bird species. Another suggests preserving wide riparian corridors of mature elms, cottonwoods, hackberry, ash and other bottomland trees and shrubs to benefit the yellow-billed cuckoo, red-shouldered hawk, yellow-throated vireo, and other birds. Another respondent asks the Chequamegon-Nicolet National Forests to ensure the viability of raptors by protecting nesting territories from disturbance, protecting post-fledgling forage areas, and re-establishing coarse woody debris and snags.

### **Game Species**

Many respondents ask the Chequamegon-Nicolet National Forests to maintain wildlife of social and economic importance, such as deer, grouse, bear, woodcock, elk, and other hunted species. These writers see the proposed plan as having a negative effect on these species, with its increased old growth and decreased aspen, and suggest more timber harvesting to enhance the habitats of the above-mentioned hunted species.

Others see an out-of-control white-tailed deer population. These respondents cite hazards to motorists from collisions with deer, the impacts to plant species from over-browsing by deer, and the pervasiveness of Chronic Wasting Disease as results of deer overpopulation. Further, these respondents blame forest fragmentation, particularly from clear-cutting, and an over-abundance of aspen as causes of deer overpopulation. These respondents ask the Chequamegon-Nicolet National Forests to reduce deer populations by establishing large areas managed for low deer density.

### **Threatened, Endangered, and Sensitive Species**

Many letter writers have suggestions for the protection of threatened, endangered, and sensitive (TES) species and Regional Forester Sensitive Species (RFSS). One respondent

argues that the Forest Plan goals for the conservation of these species need to be more clear and specific to provide adequate direction. This respondent further asks the Chequamegon-Nicolet National Forests to utilize the best scientific and commercial data available to create better standards and guidelines for TES management. As an example, the respondent points out that standards and guidelines for the pine marten do not address forest structure, composition, or size and age class distribution of snags and downed woody debris; fail to address predation on marten by the fisher; and do not provide for travel corridors or roadless security areas, which are important to marten viability. Another respondent asks the Chequamegon-Nicolet National Forests to include in the Forest Plan a list of all regional forester sensitive species along with clear guidelines and population targets that will ensure viability across the forests. One respondent asks the Chequamegon-Nicolet National Forests to clarify in the standards and guidelines the discretion available to managers when dealing with TES species.

One respondent is concerned that the Draft EIS has dismissed the possibility that a population of Canada lynx exists within the Chequamegon-Nicolet National Forests. This person asserts that data gathered by the WDNR provides information regarding regular sightings of six to eight lynx within the Chequamegon-Nicolet National Forests area. This allegedly constitutes a breeding population, which requires the Forest Plan to include habitat and recovery standards for the Canadian lynx. The respondent goes on to recommend standards and guidelines for lynx recovery.

Regarding wolves, one respondent asks the Chequamegon-Nicolet National Forests to expand roaded natural remote area designations in the Great Divide district to reduce road densities and enhance wolf habitat, and another asks the Chequamegon-Nicolet National Forests to reduce road densities that may be adversely impacting wolf habitat in the Nicolet.

A respondent asks the Chequamegon-Nicolet National Forests to add the golden-winged warbler to the regional forester sensitive species list, and to analyze the impacts of the proposed plan's forest management goals on this species.

Some respondents ask the Chequamegon-Nicolet National Forests to ensure TES species management does not significantly restrict extractive uses of the forest, and recommend that disturbances be allowed in TES habitat when those species are absent and when alternative habitat is available.

### **Management Indicator Species**

Some respondents ask the Chequamegon-Nicolet National Forests to create a scientifically supportable and comprehensive list of management indicator species. One respondent recommends addressing key ecological/sociological/economic values of the forest, then identifying the indicators that represent these values in some meaningful way. Such values might be protection of water resources and watershed integrity, maintenance of migratory bird biodiversity, and sustainable regeneration of managed forests. Another respondent asserts that the Chequamegon-Nicolet National Forests must uphold National Forest Management Act (NFMA) requirements regarding the monitoring of management indicator species and quotes the NFMA regulation that requires the Chequamegon-Nicolet National Forests to state and evaluate planning alternatives "in terms of both amount and quality of habitat and of animal population trends of the management indicator species."

## **Vegetation Management**

### **Pine Barrens**

Many respondents request the expansion of barrens areas and offer ways to enhance recovery areas. This type of landscape, these respondents say, is the rarest in the Chequamegon-Nicolet National Forests, and most in need of restoration. Some specific areas suggested by respondents for barrens management include: the Bladder Lake area; the Moquah Barrens and Riley Lake areas, areas within the Little Deerskin and Deerskin River areas, the Southeast Pine Area on the Lakewood Ranger District, and the open bracken grasslands in the Waubee/Jack Pine Camp Road areas.

One respondent asks the Chequamegon-Nicolet National Forests to focus barrens recovery only in historic barren areas (i.e., don't manage Riley Lake as a barrens). Another respondent asks the Chequamegon-Nicolet National Forests to increase barrens systems by creating a combination of recovery areas, concentrating upland openings allocations in Management Areas 3 and 4, and using the 8C and 4C land use designation. Further, this respondent asks the Chequamegon-Nicolet National Forests to recognize that the 4C Management Area designation does not replace the need for barrens managed on a permanent basis, but rather should be used as a complementary management technique.

### **Snags, Downed Woody Debris, and Recruitment Trees**

Many respondents ask the Chequamegon-Nicolet National Forests to increase the number of snags and the amount of downed woody debris within the forest. Snags and downed woody debris, these respondents say, are necessary for the viability of bobcats, owls, bats, frogs, salamanders, mosses, fungi, and the pine marten. One respondent suggests establishing several 50,000 acre patches of interior hardwoods with high levels of snags and downed woody debris. Another writer calls for recruitment of snags and downed woody debris in red and white pine stands by prescribing uneven-aged management. The Chequamegon-Nicolet National Forests, this respondent says, should recruit large blocks of these areas over time. Other management suggestions from respondents include establishing specific height and size guidelines for snags, felling poor quality trees to provide cavity trees and coarse woody debris, and establishing leave tree minimums for different management areas.

Some respondents ask the Chequamegon-Nicolet National Forests to clarify reserve tree guidelines. The WDNR writes that there is a potential for reserve trees to dominate the upper range of diameters, restricting harvest, and limiting the establishment of gaps for development of northern hardwood seedlings, saplings, and poles. The WDNR asks the Chequamegon-Nicolet National Forests to expand standards and guidelines to clarify the policy on treating reserve trees that exceed the desired level of stocking within diameter classes.

### **Early Successional Habitat**

Comments on early successional management support either the maintenance or the reduction of current levels of aspen. Comments in support of maintaining the current level of aspen stands point out that many bird species, such as the grouse, woodcock, golden-winged warbler, and neotropical songbirds, are reliant on early successional land types. One respondent cites the Breeding Bird Survey data, which shows that a greater percentage of open grassland and shrubland bird species are declining than mature forest

species. A decrease of 242,000 acres of early successional forest types, as proposed in the preferred alternative, will lead to significant population declines and likely federal listing under the Endangered Species Act. Many respondents comment that there have been sharp reductions in old fields and early successional forest habitats and large increases in mature forests. The population declines of woodcock and grouse, state these respondents, clearly reflect these habitat changes, and proposed reductions in aspen will only further exacerbate the decline of these birds. The WDNR asks the Chequamegon-Nicolet National Forests to accommodate the maintenance of early successional habitats for wildlife and hunting interests, by managing for the upper end of the recommended management range for even-aged types such as aspen, paper birch and jack pine in Management Areas 1A, 1B, 2A, 2C, 3A, 3B, 3C, 4A, and 4B.

Besides providing bird habitat, some respondents assert, aspen is a valuable resource for Wisconsin industry, especially the paper, lumber products, and veneer industries. Reductions in aspen will harm these industries.

Other respondents ask for reductions in aspen and early successional landtypes, citing an already adequate amount of aspen found in Management Areas 2 and 3.

Suggestions from respondents for Management Area 1A include: the area south of Armstrong Creek, the area northeast of Lakewood, and increasing these areas throughout the east side of the Chequamegon-Nicolet National Forests. Suggested Management Area 1B areas include: the unit labeled Management Area 4C south of the Moquah Barrens, the unit labeled Management Area 6A, in the east-central portion of the Washburn District, and the Management 4 areas north of Ino. Finally, a respondent suggests designating as Management Area 1C the 2C Management Area east of Hiles.

### **Uneven-aged Hardwoods**

Respondents commenting on uneven-aged hardwoods provide suggestions for Management Area 2B and 2C designations and request that the Chequamegon-Nicolet National Forests include more 2B Management Areas in the Forest Plan..

One respondent suggests prescribing uneven-aged management for northern hardwoods to enhance the viability of a variety of species, and further asks the Chequamegon-Nicolet National Forests to increase the desired size class from 22 inches to 25 inches, ensuring the health and viability of this vegetation type. Another respondent asks for Management Area 2B designations to provide a high number of acres suitable for timber management and the reduction of aspen acreage. Some writers see a better setting for hemlock regeneration within 2B Management Areas, and further, ask the Chequamegon-Nicolet National Forests to set a standard of no aspen for 2B areas. One respondent asserts that if the goal is to utilize these areas for interior forest and all the benefits therein for general forest biodiversity, it makes no sense to have aspen in these areas. One writer would like to see the Chequamegon-Nicolet National Forests apply the standards and guidelines of 2B areas in other areas of the Forests.

Respondents provide ample suggestions for Management Area 2B designations, including: the Lost Lake Area; the area north of Twin Lake near the town of Phelps; the areas east of the Headwater Wilderness; the Jump River/Silver Creek/Mondeaux River Bottoms; the Carter Hills and McCaslin Mountain area; and the Foulds Creek Block.

### **Even-aged Hardwoods**

Expansion of even-aged hardwood land use designations is of concern to some respondents. One respondent asserts that oak provides a vital source of food for many



wildlife species and that the Chequamegon-Nicolet National Forests should increase and maintain the acreage of even-aged hardwoods on the Forests. Further, this respondent argues that oak has been shown to be important for migrating neotropical songbirds, and that, nationally, oak species are showing a general decline. Some respondents recommend areas for 3B Management Area designation, including the Drummond Ski Trail area and the area south of Lake Namekagon.

## **Conifers**

Some respondents are concerned by the decline of jack pine stands in Wisconsin and argue that these declines are the result of successional trends, improvements in fire suppression that prevent large scale, stand-replacing fires, the lack of interest in maintaining jack pine stands, and jack pine budworm outbreaks. Arguing that jack pine stands are necessary habitat for such bird species as the Nashville warbler, Connecticut warbler, ovenbird, and black-backed woodpecker, these respondents ask the Chequamegon-Nicolet National Forests to maintain current or past levels of jack pine where appropriate.

One respondent comments that due to the expansion of white pine as a component in forest stands, and the considerable public and ecological interest in white pine, the Chequamegon-Nicolet National Forests should increase the number of naturally regenerated red and white pine stands.

One writer asks the Chequamegon-Nicolet National Forests to make red pine plantations more suitable for birds and suggests using careful management to create a structure and complexity needed for productive bird habitat.

Many respondents have suggestions for areas that should be managed as Management Area 4B, including: the area north of Highway 70 on the Park Falls District; the Round Lake/Sixteen Lakes area; and the areas east and west of the historic Military Road Scenic Byway.

## **Old Growth**

Many respondents request the restoration of old growth stands as significant components of the Chequamegon-Nicolet National Forests. One respondent asks the Chequamegon-Nicolet National Forests to protect old growth stands by designating them as ecological reference areas, adding that the Chequamegon-Nicolet National Forests should include the small isolated stands of relic hemlock, hemlock-hardwood, old growth northern hardwoods, natural origin pine forest, and other rare forest types currently not contained within the larger natural community complexes identified for ecosystem reference area designation. One respondent applauds the recognition of 86,100 acres of old growth, while requesting assurance that these areas will remain protected from logging and salvage operations by keeping the current standards and guidelines protecting these areas in place. Another respondent sees the two national scenic trail corridors as opportunities for promoting “big tree” character and asks the Chequamegon-Nicolet National Forests to increase its management goal of 25 percent old growth along these corridors to 50 percent. Another respondent states that, considering old growth’s scarcity in the Forests, the Chequamegon-Nicolet National Forests should protect all existing old growth stands. One respondent suggests enhancing connectivity between old growth stands by reducing road density in these old growth areas, making non-motorized designations where possible, and using 2B, 2A, 3B, and 4B Management Area designations where roads must remain open.



The U.S. Fish and Wildlife Service writes that the Chequamegon-Nicolet National Forests harbors a small population of olive-sided flycatchers, an old growth and bog species. There is a positive trend in northern Wisconsin for this species, one of the few such trends in the U.S. or southern Canada. The Fish and Wildlife Service recommends restoring old growth oak forests, white and red pine forests, and large blocks of mature contiguous old growth habitat on the Forests to assist in boosting the population of this species.

### **Invasive Species**

Many respondents express concern regarding invasive, non-native species. One respondent states that road densities are too high on the Chequamegon-Nicolet National Forests and that they serve as pathways for invasive plants and animals. Some respondents argue that roads—even small utility roads—and ATVs are a major conduit for introducing and spreading invasive plant and annelid species, suggesting that reduced road densities and eliminating OHVs from natural areas will limit the spread of invasives.

### **Transportation Infrastructure**

Respondents comment on the Chequamegon-Nicolet National Forests' road densities, suggest road density levels for specific areas, and provide clarifications for the standards and guidelines for transportation systems in various management areas.

Some respondents call for a ban on road-building within the Chequamegon-Nicolet National Forests. Roads, one writer asserts, fragment the Forests, allow weeds and other noxious pests to become established, and provide incentive for increased logging and accompanying damage to the ecosystem. One respondent argues that the current road densities have obliterated approximately 30,000 acres of forest, ruining opportunities for remote hunting, skiing, hiking, and camping. Further, this road system is very expensive to maintain. This respondent asks the Chequamegon-Nicolet National Forests to reduce overall road densities to three miles per square mile. The WDNR recommends that greater portions of the Chequamegon-Nicolet National Forests be designated low road density areas as well, to protect habitat for wildlife sensitive to human disturbance.

Some respondents call for the decommissioning of roads, especially unclassified roads, at a rate comparable to that of the road construction that occurred between 1986 and 1996. Other writers ask the Chequamegon-Nicolet National Forests to stop obliterating low level and uninventoried roads. These low level roads, respondents assert, provide uses for many recreationists, including hunters, hikers, berry-pickers, and OHVs, and decrease impacts to the Forests by dispersing these forest users.

The Wisconsin County Forests Association asserts that roads of all types are used by the public for a wide variety of purposes that provide social and economic benefits, such as hunting, fishing, wildlife viewing, firewood cutting, and many others. This group asks the Chequamegon-Nicolet National Forests to keep the current road system in place until an accurate road inventory, with maps and a definition of “road” to which the group is amenable, is completed. Further, the counties argue that they and others need road access to existing and future gravel and sand sources.

A respondent that helped develop Transportation System standards and guidelines provides an extensive series of suggested modifications.

Overall, the public asks the Chequamegon-Nicolet National Forests to establish road densities that ensure species viability and opportunities for quiet recreation, but also accommodate motorized and economic uses of the forest.

## **Recreation**

Some respondents interested in recreation express fairly general concerns, such as asking that the revised Forest Plan focus on recreation rather than resource extraction. Others ask that planners develop provisions for diverse recreation opportunities and facilitate forestwide access for people seeking a wide array of motorized and non-motorized recreational opportunities. But judging from public comments, balancing motorized and non-motorized recreation access and conflicts is the key issue facing the Chequamegon-Nicolet National Forests' recreation managers. People express very specific concerns related to their chosen recreation pursuit, typically asserting that their avocation should receive priority or special consideration. Although some suggest that shared use of trails is the solution to access concerns, others assert that OHVs are not compatible with non-motorized recreation pursuits and that the different forms of recreation should be highly segregated. Other areas of concern include hunting, boating, dog training, developed facilities, and trail maintenance, with many comments focused on the relationship of each to motorized recreation.

With the crux of the recreation debate being the motorized and non-motorized conflict, striking a balance that satisfies both camps is possibly the most daunting task facing the Chequamegon-Nicolet National Forests. Each side harbors perceptions that the other exerts special influence over the planning team, and thus both are skeptical that proposed recreation solutions will meet their needs. People demand that ATV and snowmobile access be increased to reflect the growing population of both vehicles. Those who pursue non-motorized recreation assert that access, if allowed, must be limited and strictly managed. This divergence in viewpoints results in proposals to maintain past, separate management philosophies for the Chequamegon and the Nicolet. People ask that the Nicolet recreation policies focus on non-motorized, "quiet" recreation pursuits, with some asserting that motorized boating be prohibited on the Forests' waters. Others contend that limiting OHV access infringes upon their rights as taxpayers and part-owners of the national forest system. They argue that restricting motorized access is elitist and specifically harms the disabled and the elderly.

One commonality found in the comments is requests for additions to the recreation infrastructure. Trail expansions or designations are requested by equestrian groups, cyclists, hunters, and dog trainers in addition to the requests made by advocates of more common forest uses. Some respondents suggest reliance on ATV organizations in incentive-based agreements to expand and maintain the ATV trail system. Another asserts that trail maintenance and monitoring partnerships should extend across the recreation spectrum to include non-motorized forest users. Many respondents are sympathetic to forest natural resources, suggesting that OHV trails be moved away from riparian areas, and some support trail closures in spring when resources are most fragile.

The proposed policies include many ATV use provisions that differ from historical use and engender enforcement challenges. Several people note that current enforcement capabilities are inadequate, citing specific user conflicts. As a result, many respondents express concern for resources and for public safety and assert that it is critical that strict monitoring and enforcement plans be included in the Forest Plan. One respondent suggests diverting road-building funds to enforcement to overcome budgeting difficulties, mirroring the concern that the Chequamegon-Nicolet National Forests should prioritize

recreation over resource extraction. Other respondents support user fees to fund the Forests' recreation program. Some champion educational programs and heavy penalties for violations as low-cost alternatives to achieving responsible trail use.

## **Landownership and Special Designations**

Comments regarding property issues and special designations span a wide spectrum; some respondents ask for no land use restrictions, some request restoration and preservation of the forests, and some propose a variety of compromises. People comment on land acquisitions and exchanges, rights-of-ways, roadless and wilderness areas, and special designations. Concerns tend to focus on the use restrictions that result from special status designations, while some respondents commend the Chequamegon-Nicolet National Forests for taking steps to preserve habitat and quiet recreation opportunities with special designations.

To flesh out concerns and commendations more specifically, respondents ask the Chequamegon-Nicolet National Forests to support both conservation of adjacent private lands and to expand its boundaries. One respondent implores the Chequamegon-Nicolet National Forests to not sell or trade forest lands to land developers. Another specifies that new land acquisitions should be designated for multiple use only, with exceptions being donated lands and land acquisitions that fall within current wilderness boundaries. Some people also ask that military training be permitted to continue on the Forests, that maps of the Forests be updated, and that continued access to inholdings be permitted.

Roadless areas are vital to the long term health of national forests, asserts one respondent, and should be expanded using "the landscape analysis and design work of USFS biologists."

Along with specific comments in favor of and against wilderness study area recommendations come more general concerns. For example, a respondent requests that the Final EIS include additional analysis justifying wilderness proposals. Some people commend the preservation efforts but also caution the Chequamegon-Nicolet National Forests to examine the compatibility of adjacent lands before making recommendations for wilderness. One respondent calls for all recommendations to be abandoned in favor of returning proposed lands to multiple use management. Yet another implores the Chequamegon-Nicolet National Forests to recommend all RARE II areas for wilderness designation. Another respondent questions the fate of lands recommended for wilderness but not officially designated as such by Congress, asking, "Will this acreage be returned to active management or continued non-management?"

Comments on the Ice Age and North Country National Scenic Trails express concern that both are neglected in the proposed Forest Plan and request that the Final EIS include detailed information to remedy this shortcoming. Respondents also ask for provisions that protect both trails and ask for assurances that the earlier Corridor Plan is followed and included in the Forest Plan. One letter writer asks that limited mountain biking access continue on the North Country Trail, suggesting that the Final EIS include language to ensure this.

Respondents ask that the Chequamegon-Nicolet National Forests establish a system to designate and protect lakes and lakeshore habitat. In particular, people ask that both Lake Eleven and Hay Lake be protected from the detrimental effects of motorized recreation, asserting that both have unique qualities and warrant special protection.

Some respondents ask that the Forest Plan include additional Wild and Scenic River recommendations, and again advocate for protection of specific rivers and riparian areas from the impacts of OHVs.

Regarding semi-primitive non-motorized management areas, respondents advocate both for and against designation of many specific areas. One typical respondent tells of experiencing “broken forests with unnatural open areas, excessive deer, invasive species, old logging trails everywhere, sterile pine plantations, all scarred by ATV use,” and implores the Chequamegon-Nicolet National Forests to expand and protect non-motorized areas. Respondents express doubts about current analysis and ask that the Final EIS include more clear justification for not expanding semi-primitive non-motorized areas. Other respondents deplore the impacts non-motorized designations will have on the timber industry and on motorized recreation access, and raise doubts about the wisdom of relocating (or closing) motorized routes.

Regarding the designation of special management areas, some respondents express concern that rights are encroached upon when designations are made. Some comments are critical of Chequamegon-Nicolet National Forests' special designations, asserting that they create de facto wilderness areas. These commenters, instead, champion “multiple use” management of the Forests. Others ask that all identified Ecological Reference Areas be protected and that aquatic areas be afforded the same protections as terrestrial areas. There is support for the maintenance of existing research natural areas, but contradictory comments call for the Final EIS to clarify and justify the designations.

Comments on land use and special designation illustrate the polarized nature of the issues facing the planning team. Many respondents seem firmly entrenched either in favor of preservation or in favor of “multiple use” management. Providing clarification of special designations and further analysis and justification for management decisions in the Forest Plan is probably important, but will likely ameliorate few differences of opinion.

## **Natural Resources Management**

How the Chequamegon-Nicolet National Forests should manage natural resources is, along with recreation management, the Forest Plan topic most often addressed by respondents. While concerns about natural resource management pervade the proposed Forest Plan, Draft EIS, and this document, this section addresses specific concerns about commodity extraction.

Beginning with the most general comments, respondents provide conflicting direction regarding appropriate guiding philosophies and goals for natural resource management. Some respondents argue that logging, mining, and other extractive activities degrade opportunities for recreation, which, they argue, is a more important function of the national forests. As one respondent summarizes, “Recreation serves all the people of Wisconsin—those that enjoy it and those who support the tourism industry. Logging loses money, causes soil erosion, and threatens rare birds, animals, and plants.” Other respondents are concerned about perceived logging impacts to natural systems, and argue that logging should be subordinate to the primary purpose of biodiversity preservation. Still other respondents suggest that the Chequamegon-Nicolet National Forests attempt to recreate historic conditions in part (increase natural origin red pine/white pine) or whole (“move back towards a better reflection of historic conditions”).

In a different vein, respondents assert that the Chequamegon-Nicolet National Forests should be managed for multiple uses. With the exception of some respondents who contend that wildlands and biodiversity are part of the pantheon of multiple uses, multiple

use management is most commonly thought of in terms of logging, mining, and motorized recreation. For example, one respondent who is disappointed with the Draft EIS asks that the new Forest Plan “give fair and equal consideration to the multiple uses of the forests for purposes which include hunting, motorized recreation, and timber production instead of favoring set asides, no harvest zones, and limits on reasonable motorized access to the forests.”

## Logging

More specific statements about logging policy, rather than guiding philosophy, are plentiful. Respondents suggest that the Chequamegon-Nicolet National Forests decrease or prohibit logging. Some call for prohibiting logging in old growth areas, in riparian and wetland areas, and in remote areas that serve as habitat for endangered species. Some call for the preservation of unlogged strips next to Forest roads. Respondents request no logging on percentages of the Forests ranging from 40 to 100 percent.

Other concerned citizens, organizations, and businesses advocate increased logging on the Forests, including riparian zones, areas designated non-suitable for logging, and non-motorized areas; these suggestions are often based on concern for the welfare of many wildlife game species and the environment of third world nations. Some respondents criticize the proposed Forest Plan as a prescription for “overmature” forests, and therefore urge more logging. Similarly, respondents call for the completion of scheduled logging sales because “all the evidence indicates that wildlife that need early successional habitat are in decline due to a lack of suitable habitat.”

Currently proposed or initiated timber sales, incidentally, are the subject of calls for completion, suspension until completion of the new Forest Plan, and suspension until completion of new EISs.

Several respondents requested improved, clarified, or supplemental information and analysis in the Draft EIS relative to logging impacts. In the first category come suggestions that the Final EIS should correct the long-term sustained-yield calculation for timber. In the other categories come calls for the agency to provide an explanation of why the average annual ASQ proposed in the alternatives has been reduced, and a request that the Final EIS list all biologically suitable timber acres, total production volume from those acres, and constraints on harvest.

A number of respondents address the specifics of the timber sale program via the allowable sale quantity (ASQ). Some request clarification of how sustained yield and ASQ were derived, others request that the two National Forests calculate ASQ separately. Some respondents ask that the ASQ be increased, while others argue that it should be decreased. Some respondents ask that the ASQ be calculated only as a ten-year total. Some respondents ask the Chequamegon-Nicolet National Forests to emphasize to the public that every alternative proposes an ASQ lower than that of the 1986 Forest Plans. Some respondents ask that the Chequamegon-Nicolet National Forests actually harvest ASQ.

Many respondents are as interested in harvest method as in harvest amount. Some suggestions are very general, e.g., “When the trees in the forest are mature they should be harvested,” suggested increases in clear-cutting, and “it is a mistake to have more old growth forests.” Just as straight-forward are suggestions that the new Forest Plan prohibit clear-cutting or encourage selective logging.

More specific recommendations are also made. For example, some respondents ask that the Chequamegon-Nicolet National Forests use closed canopy thinning in hardwood stands, or that the Forest Plan prescribe selective, uneven-aged timber management in Management Area 2B. Other prescriptions for harvest method are provided, while other respondents request local and site-specific flexibility to determine appropriate harvest methods.

Many respondents focus on harvest age. For example, one person suggests that extended rotation be treated as maximum rotation, and that extended rotation duration be reduced for red oak, red pine, jack pine, upland balsam fir, and white pine. Some respondents ask that aspen extended rotation age be increased to 60 years (others to 65 years in specific management areas), while some respondents request generally longer rotation between harvests. One respondent requests management of the Forests for extended rotation, high-quality sawlogs.

A few comments focus on the mechanics of timber harvest, e.g., a suggestion that the Chequamegon-Nicolet National Forests require loggers to remove and use all slash, and suggestions that the Chequamegon-Nicolet National Forests require contractors to pay for the installation and subsequent removal of logging roads. Some respondents request that logging only be permitted when the ground is frozen.

### **Other Forest Products**

Some respondents address the role of special forest products, asking that the Chequamegon-Nicolet National Forests better evaluate sustainable methods and amounts of harvest, and convey that information to harvesters.

Comments regarding mining on the Chequamegon-Nicolet National Forests were often categorical, e.g., a call to maintain all existing roads in order to promote energy and mineral development, and an argument that gravel and other mining disturb local water resources and should be prohibited.

Some comments, however, were more narrowly focused. For example, a respondent calls for clarification of what mineral rights are owned, reserved, and outstanding on the Chequamegon-Nicolet National Forests, and articulation of the consequences such categorizations have for exploration and development rights. A number of comments focus on the appropriateness of mining in specific management areas, and request more stringent standards and guidelines in Management Areas 5B, 6A, 6B, and 8A through 8G.

### **Forest Health Management**

Respondents offer a number of perspectives on fire, insects, disease, and forest health. Regarding fire, some respondents call for increased use of fire as a management tool, while others request a more complex, complete, and clearly articulated policy in the Forest Plan for dealing with both prescribed and wild fires. Some respondents request greater restrictions on the placement of structures in fire-prone areas. Finally, some respondents deplore the use of commercial logging as a fire-management tool, calling instead for local treatment around structures in the urban-wildlands interface.

Respondents offer disparate views on appropriate responses to natural disturbances. Some respondents argue that salvage logging is an inappropriate response to natural disturbances in areas otherwise not recommended for logging. Other respondents request that the Chequamegon-Nicolet National Forests consider impacts of natural disturbances when planning timber sales and not harvest a forest that has been heavily impacted by fire, blowdown, or other disturbance.



In contrast, some respondents request development of quick, emergency procedures to salvage log in the wake of disturbances. Some respondents argue that forest health will be promoted—and disturbances reduced—if the Chequamegon-Nicolet National Forests logs aggressively. “Our forests are in sad shape and will constantly need management,” comments one such respondent. “Harvest a minimum of 85 percent of annual growth.”

Some respondents suggest the need to better understand how logging affects forest health, asking for careful monitoring of effects in areas that have been logged. Still other respondents request that both the Forest Plan and site-by-site decisions be made flexibly and with maximum responsiveness to an impermanent environment and new information.

## **Monitoring and Evaluation**

Numerous respondents commented on monitoring and evaluation needs on the Chequamegon-Nicolet National Forests. For example, a respondent requests opportunities for the public to comment on an annual monitoring plan of operations based on Chapter 4 of the 2004 Forest Plan. With the exception of this comment, most respondents direct their concerns toward the Forest Plan, i.e., assuming that monitoring and evaluation will be integral to the Forest Plan.

Comments often focus on a desire for hard, quantitative measurement of achievement of standards, objectives, and goals, sometimes to ensure that standards for monitoring and evaluation are clear and enforceable, and other times simply to establish the most effective means of evaluating conditions and impacts. Some respondents request monitoring of specific areas or impacts, including interior northern hardwood stands and ATV use and impacts. One writer asserts that the proposed Plan’s monitoring program lacks the degree of specificity and scientific support needed to meet National Environmental Policy Act’s (NEPA) requirements for analysis and National Forest Management Act’s (NFMA) requirements for monitoring. To comply with these laws, they say, the Chequamegon-Nicolet National Forests’ monitoring programs must fully assess the effects of human activities on biological diversity and ecosystem structure and function. Further, without specific monitoring methods the public itself cannot assess whether monitoring programs are ensuring the protection and improvement of forest conditions. Establishing standards and guidelines for monitoring forest restoration projects, a respondent suggests, will strengthen and develop the monitoring plans.

## **Social and Economic Impacts**

Comments on the social and economic impacts of the proposed Forest Plan echo now familiar themes and divisions. While some respondents emphasize the value of extractive resources, others communicate preference for forest values not so easily quantified. Respondents of all perspectives are adamant that the Chequamegon-Nicolet National Forests incorporate their suggestions into the Forest Plan.

The most common criticism of the social and economic impacts sections of the Draft EIS is that the document lacks adequate analysis of impacts to the region’s economy and employment levels. Conversely, other respondents insist that planners give added weight to intrinsic values and concerns. They also express fear that current management practices will diminish the worth of the Chequamegon-Nicolet National Forests to future generations.

Some people convey a sense of economic reliance on the Chequamegon-Nicolet National Forests’ resources and consequently expect forest managers to assume some level of responsibility for stabilizing the area’s economy. Specifically, some people ask for



expanded OHV access to lure tourists to the area and production and sale of high-quality sawlogs to help support local businesses. Others caution the planners to not exaggerate the significance of timber harvesting to the local economy, asserting that the bulk of timber harvest comes from non-federal lands.

Some respondents champion the economic return from environmental tourism and preservation over motorized recreation and timber harvest. Some contend that motorized recreation produces far more revenue than non-motorized recreation. Another declares the contention false, arguing that “David Marcouleier of UWM (Madison, WI) found that although motorized vehicle users spend more money per capita, it is spent primarily on the purchase of the vehicle, not in the area of use of the vehicle.”

Some respondents also ask for additional economic analysis and trends to be included in the Final EIS. In particular they request that the Chequamegon-Nicolet National Forests consider and include the economic trends of the affected counties and forest products industry, asserting that the figures will support their contention that tourism is more important to the local economy than timber production. Some respondents also request that an economic analysis of the timber sale program and a plan for monitoring be included.

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## **Response to Comments**

Public concern statements and their associated responses are not necessarily listed in numeric order. Instead they are shown in the same order as that provided in the “Analysis of Public Comment” report prepared by the Content Analysis Team. In some cases, public concerns (PC) were combined for response. If that combination moved a PC out of order, a cross reference was supplied so that the PC and response could be more easily found, if comparison to the larger report was desired. When PCs are combined for response, each PC is listed above the associated Response statement.

### **Purpose and Need**

**PC #: 1**

**Public Concern: The Forest Plan should emphasize the preservation and restoration of the environment.**

**Response:** Preservation and restoration of the environment is one of many management emphases utilized in the revision of the Chequamegon-Nicolet National Forests’ Plans. 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.” 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.

**PC #: 2**

**Public Concern: The Forest Plan should not attempt to return the forest to pre-European conditions.**

**Response:** The Notice of Intent to Prepare an Environmental Impact Statement for Revision of Land and Resource Management Plans (1996) identified Ecosystem Restoration as an area in need of change during the forest plan revision process. Forest ecosystem restoration problems are addressed by efforts to restore naturally occurring

terrestrial and aquatic components and rare, declining, or absent processes. See Chapter 1 of the FEIS for the types of ecosystems that will be restored at various scales.

Restoration of some parts of the Forests to ecological conditions present before intense vegetation alteration at the turn of the 19th century will take place primarily for the purpose of increasing the probability of maintaining diverse and viable populations of plant and animal species present on the Forests, a requirement in the 1982 National Forest Management Act regulations (36 CFR 219.19). Some species require forest types and/or ecological conditions currently under-represented on the Chequamegon-Nicolet National Forests.

Ecosystem restoration activities do not intend to “turn back the clock” on a societal basis. The Chequamegon-Nicolet National Forests recognize that people, living conditions, desires, and needs have changed since the 1800s. The information about estimated ecological conditions prior to the large scale changes in the late 1880s and early 1900s serve as valuable references to the conditions under which native species existed.

**PC #: 221**

**Public Concern: The Forest Plan should be adaptable to changing conditions.**

**Response:** While National Forest Management Act regulations require a forest plan revision every 10 to 15 years, they also require the forest to establish a monitoring and evaluation plan. The purpose of monitoring and evaluation is to determine how well the current forest plan is working. Forest plans can be amended or revised to adapt to new information and changed conditions. For more information, see Chapter 4 (Monitoring and Evaluation Plan) of the 2004 Chequamegon-Nicolet Forest Plan. It provides programmatic direction for monitoring and evaluating Forest Plan implementation.

## **Decision-making Authority**

**PC #: 510**

**Public Concern: The Chequamegon-Nicolet National Forests should separate its management agenda from the agenda of any political party or administration.**

**PC #: 231**

**Public Concern: The Chequamegon-Nicolet National Forests should resist efforts by the current administration to open public lands to resource exploitation.**

**Response:** As part of the executive branch of government, the Forest Service carries out its mission of caring for the land and serving people within the guidelines it is given by the Administration and Congress. The Forest Service also works with other agencies and local and state governments as part of developing suitable management direction. The natural resources the Forest Service manages are highly valued and the issues associated with them are often extremely controversial. Factors weighed in the decision-making process include laws, agency direction, and public comment.

**PC #: 4**

**Public Concern: The Forest Plan should not favor the timber industry.**

**PC #: 5**

**Public Concern: The Forest Plan should not favor the views of environmental groups.**

**PC #: 6**

**Public Concern: The Forest Plan should not favor the views of the OHV industry.**

**Response:** All comments were reviewed and considered during the formulation of the FEIS. Many letters were submitted by organizations representing specific interests. These comments were reviewed in the same way that comments from individual citizens were reviewed.

Please see the introduction to this appendix for a description of how all comments were analyzed and how public concern statements were developed. All comments received, regardless of the sender, were part of the same content analysis process.

**PC #: 223**

**Public Concern: The Chequamegon-Nicolet National Forests should exclude deep ecology and biocentric perspectives from forest management decisions.**

**Response:** Management decisions reflected in the 2004 Forest Plan and the FEIS for the Chequamegon-Nicolet National Forests utilize the best available information and science and are developed under guidance established by the National Forest Management Act, the Multiple Use-Sustained Yield Act, the National Environmental Policy Act and a variety of other legal acts and requirements mandated by Congress.

## **Public Involvement**

**PC #: 8**

**Public Concern: The Final EIS should be user friendly.**

**Response:** Every effort was made to ensure that the FEIS, supporting documents and maps are legible, understandable, and written in plain language. Charts and tables were used when possible to more effectively present information. Layout, which provides for greater ease in reading, was also considered when preparing this document.

**PC #: 227**

**Public Concern: The Chequamegon-Nicolet National Forests should include snowmobilers in the planning process by soliciting their input and adding a winter comment period.**

**Response:** A wide variety of user groups representing both motorized and non-motorized interests are on the plan revision mailing list; many have been on the list since 1995. As a result, they have been involved in the plan revision process and have received meeting notifications, newsletters, information packets, comment forms, and other mailings. User group officials as well as individual members are represented on the plan revision mailing list. We have stressed many times that individuals can become a part of the process whether they are able to attend meetings or not. Written comments do not carry less weight than oral comments. They all receive equal review and consideration.

In addition to mailing plan revision information to the approximately 2000-member mailing list, news releases and announcements are distributed to over 83 media contacts.

**PC #: 229**

**Public Concern: The Chequamegon-Nicolet National Forests should conduct hearings using an inclusive, partnership model.**

**Response:** The main purpose of the hearings was to provide an alternative means for the public to make written and oral comments on the Proposed Forest Plan and Draft Environmental Impact Statement for the Chequamegon-Nicolet National Forests. Formal hearings were an effective way of obtaining further comments during the official comment period. Open houses were also held during the comment period for those who wished to share their concerns with forest staff on a more personal or face-to-face basis.

**PC #: 9**

**Public Concern: The Chequamegon-Nicolet National Forests should schedule public meetings in the populous lower half of Wisconsin.**

**Response:** During the comment extension period, in July and early August 2003, three open houses and hearings were scheduled in larger metropolitan areas further from the Chequamegon-Nicolet National Forests. They were held in Waukesha, Madison, and Eau Claire, Wisconsin. A total of 146 attendees provided 48 written comments and 65 oral comments.

**PC #: 7**

**Public Concern: The Chequamegon-Nicolet National Forests should not implement the Roadless Rule, thus undermining local collaboration.**

**Response:** The Chequamegon-Nicolet National Forests has not implemented the Roadless Area Conservation Rule (RACR). It is currently under litigation and court injunction, and the rule or policy related to RACR could change in the future. However, a June 7, 2001 letter from the USDA Forest Service Chief requires plan revisions to “. . . consider, as appropriate, the long-term protection and management of unroaded portions of inventoried Roadless areas. This may include a determination that some Roadless areas be recommended for permanent wilderness designation.” Additionally, National Forest Management Act regulations (36 CFR 219.17) require that roadless areas within the National Forest System be evaluated for recommendation as potential wilderness areas.

**PC #: 230**

**Public Concern: The Chequamegon-Nicolet National Forests should partner with counties when deciding land management issues.**

**Response:** Throughout the plan revision process, the Chequamegon-Nicolet National Forests have held consultation meetings with local governments. The Forests have worked with the eleven northern Wisconsin Counties that have national forest land within their borders to keep them informed of Plan revision progress, and, likewise, to understand the counties' perspective on land management issues. Consultation with the counties will continue as the 2004 Forest Plan is implemented on the ground.

**PC #: 228**

**Public Concern: The Chequamegon-Nicolet National Forests should use people with specific, on-the-ground knowledge of the area to process public comment.**

**Response:** All letters, emails, faxes, comment forms, and transcripts of public hearing testimony received as public comment on the Proposed Forest Plan and DEIS were compiled, organized, read, and analyzed by the U.S. Forest Service Content Analysis Team (CAT). This team, a unit of the U.S. Forest Service Washington Office Ecosystem

Management Coordination branch, specializes in approaches to public comment processing and consideration. CAT provides objective and unbiased comment review and analysis based on their experience working on content analysis projects at the national, regional, and local level. See the introduction to this Appendix for more specific information about the content analysis process.

The Forests' Plan Revision Core Team and Leadership Team reviewed the summarized Public Concerns developed by the CAT, as well as comments, to determine what changes, if any, needed to be incorporated into the 2004 Forest Plan and FEIS. Responses to the comments were completed by experienced resource personnel, and reviewed by the Forest Supervisor. All comments received by the public are part of the planning record for the Chequamegon-Nicolet National Forests. Interdisciplinary team members could also review database reports that contain responses in a variety of topics and categories.

## **Use of Science**

**PC #: 518**

**Public Concern: The Chequamegon-Nicolet National Forests should incorporate the latest science into the planning process.**

**PC #: 515**

**Public Concern: The Forest Plan should prescribe methods to adequately assess the conditions and status of species, communities, and systems.**

**Response:** Forest specialists reviewed the most current scientific information available during the plan revision process. This is an on-going process that will continue after the 2004 Forest Plan is put into action. As more studies and information become available, they will be reviewed and incorporated into the Plan as appropriate.

**PC #: 3**

**Public Concern: The Forest Plan should include sub-plans that incorporate the differing conditions and physical separation of forest units.**

**Response:** The 2004 Chequamegon-Nicolet National Forests Land and Resource Management Plan (Forest Plan) is a programmatic document that guides all natural resource management activities on the Forests and establishes management goals and objectives, allocates land to different management emphases, and provides standards and guidelines for implementation.

Management Areas (MAs) define where different management activities and vegetative emphases take place (see Chapter 3 – 2004 Forest Plan and maps in the map packet). This guidance provides general direction for the Forests; subsequent project level (“sub-plan”) decisions will take into account site characteristics and situations unique to the project area.

**PC #: 519**

**Public Concern: The Chequamegon-Nicolet National Forests should use GIS tools to plan for the viability of multiple species.**

**Response:** GIS tools, along with vegetative data in the Combined Data Systems (CDS) Database, is used on the Chequamegon-Nicolet National Forests when conducting a variety of analyses (Environmental Assessments and Environmental Impact Statements) at the project level. This gives specialists and decision makers the information they need when determining the effects of potential on-the-ground activities within specific areas

on the Forests. GIS has been an integral part of the Forest Plan revision process, including analyses associated with species viability.

**PC #: 523**

**Public Concern: The Forest Plan should establish thorough and specific monitoring programs.**

**Response:** The Monitoring and Evaluation Plan in the 2004 Forest Plan is in compliance with direction specified in the National Environmental Policy Act (NEPA) and the National Forest Management Act (NFMA). The annual monitoring plan of operations will identify which specific items will be monitored in the coming year, as well as the methods to be used. It will include identification and scheduling of various site-specific, on-the-ground monitoring activities, as well as descriptions of the purpose, methods, locations, responsible persons and the estimated cost. Budgetary constraints can affect the level of monitoring that can be done in a specific fiscal year. If budgetary levels limit the Chequamegon-Nicolet National Forests' ability to perform all monitoring tasks, those items specifically required by law would be given the highest priority.

**PC #: 522**

**Public Concern: The Forest Plan should include standards and guidelines for measuring forest restoration implemented in conjunction with management activities.**

**Response:** One of the purposes of establishing a Monitoring and Evaluation plan is to determine how well objectives have been met and how closely management standards and guidelines have been applied (36 CFR 219.12 (k)). Therefore, having monitoring standards and guidelines would not be appropriate since, by definition, they generally limit project-related activities, rather than compel or require them. The adequacy of forest restoration and is one of the monitoring questions addressed in the Monitoring Plan (see Table 4-2a of the 2004 Forest Plan). An annual monitoring plan of operations and evaluation report will made available to the public during plan implementation.

**PC #: 226**

**Public Concern: The Final EIS should include information regarding potential timber outputs versus the specific ASQ reductions resulting from land management constraints.**

**Response:** The response to this Public Concern statement is located in the ASQ section of this Appendix.

**PC #: 232**

**Public Concern: The Final EIS should bring the local social and economic analyses into balance with the ecological analysis.**

**Response:** Several economists and scientists were consulted throughout the plan revision process. Some of those consulted were Pamela Jakes (Social Scientist, North Central Research Station), Jan Harms (North Central Research Station), Robert Potts (Social Scientist, North Central Research Station), Susan Winter, (Economist, Inventory and Monitoring Institute), Rick Hokans (Economist, Region 9 Office USDA Forest Service), Mike Retzlaf (Economist, Region 2 Office USDA Forest Service), and Mike Niccolicci (Economist, Inventory and Monitoring Institute). These experts were involved in one aspect or another of the creation of the Social/Economic Analysis section of the Final Environmental Impact Statement (FEIS). Along with this expert assistance, IMPLAN and



SPECTRUM computer models were used in the social and economic analysis. For more details about the analysis process see Chapter 3 and Appendix B of the FEIS.

**PC #: 235**

**Public Concern: The Final EIS should include a thorough social analysis.**

**Response:** The DEIS underwent extensive revision and rewrite to produce the FEIS. Due to comment and internal direction, the social analysis was expanded and clarified. For more information about the Social Analysis, please see Chapter 3 in the FEIS and Appendix B.

**PC #: 715**

**Public Concern: The Forest Plan should include a research strategy to monitor ecological processes of natural succession.**

**Response:** Monitoring tasks do not need to meet the statistical rigor of formal research, so it is not necessary to outline a research strategy in the FEIS or 2004 Forest Plan. However, in Table 4-2a in Chapter 4 of the Forest Plan, under Goal 1.2, there are objectives, monitoring questions, and other monitoring strategies that would be a part of the annual monitoring and evaluation plan (also see the response to PC #: 523).

**PC #: 237**

**Public Concern: The Forest Plan should establish the Diversity Maintenance Areas developed under the guidance of Jack Wolter.**

**Response:** The ground inventory for the Landscape and Analysis Design (LAD) process also identified ecosystems that were a high priority for restoration and were incorporated into the 2004 Forest Plan. This inventory process and subsequent analyses have advanced the Forests' knowledge of the type and location of restoration needs, and supercede much of the work done earlier. Some of these areas do coincidentally overlap with the Diversity Maintenance Areas suggested in the late 1980's. The Diversity Maintenance areas were not formally designated in the 1986 Forest Plans.

**PC #: 233**

**Public Concern: The Forest Plan should extend protection and restorative management to all areas identified in the Scientific Roundtable's regional gap analysis.**

**Response:** The recommendations provided by the *Report on the Scientific Roundtable on Biological Diversity Convened by the Chequamegon and Nicolet National Forests* (1994) introduced several new issues and provided information about significant changes in conditions (since 1986) that influenced forest plan revision. In 2002, the USDA Forest Service published its *USDA Forest Service Strategic Plan*, which sets long-term goals and objectives that will guide future agency actions in concert with the Government Performance and Results Act (Results Act). One objective is to "provide ecological conditions to sustain viable populations of native and desired non-native species and to achieve objectives for Management Indicator Species/focal species." This strategy is in accordance with recommendations provided in the Report.

National forests are managed to provide for the use of all the various renewable resources in a combination that best meets the diverse needs of the American people. The 2004 Forest Plan strives to achieve a balance among competing resource uses.

## Agency Organization and Funding

**PC #: 524**

**Public Concern: The Forest Service should not link forest managers' performance to timber production.**

**Response:** Forest managers' performance criteria are based on many factors. Forest plan revision does not make decisions regarding employee performance, nor on the criteria used for performance determination.

**PC #: 241**

**Public Concern: The Forest Service should ensure adequate staffing and funding for implementation of the Forest Plan.**

**PC #: 242**

**Public Concern: The Forest Plan should include a strong law enforcement plan.**

**PC #: 243**

**Public Concern: The Forest Plan should establish user fees to cover the costs of law enforcement.**

**Response:** The Forests work constantly to ensure adequate staffing and funding to manage these lands and associated natural resources. However, those efforts and related decisions are administrative actions and are outside of the forest planning process. Law enforcement resources are also planned, funded, and allocated through administrative processes, separate from the forest planning process, according to existing statutes, regulations, and Forest Service policy (FSM 5302 and FSH 5309.11 and others). In addition, the ability of the Chequamegon-Nicolet National Forests to collect user fees is determined by national programs and policies. Decisions to establish user fees are not within the Forests' authority.

## Alternatives (general)

**PC #: 425**

**Public Concern: The Chequamegon-Nicolet National Forests should secure staffing and funding adequate to implement the selected alternative.**

**Response:** The Forests work constantly to ensure adequate staffing and funding to manage these lands and associated natural resources. However, those efforts and related decisions are administrative actions and are outside of the forest planning process.

Law enforcement resources are also planned, funded and allocated through administrative processes, separate from the forest planning process, according to existing statutes, regulations, and Forest Service policy (FSM 5302 and FSH 5309.11 and others).

**PC #: 467**

**Public Concern: The Final EIS should clarify the roadless alternative and consider a roadless restoration alternative.**

**Response:** An alternative considering all 18 inventoried roadless areas included in the Roadless Area Conservation Rule of 2001 (RACR) and mapped in Volume 2 of the Roadless Area Conservation Rule Final Environmental Impact Statement (RACFS) was considered and eliminated from detailed study. This conclusion was based on the results of a 2002 Roadless Area Inventory and Wilderness Evaluation that found that only two of the RARE II areas first identified in 1979 still met minimum roadless standards (although

even these areas did not fully meet inventory criteria). The 2002 Inventory examined 67 areas on the Forests, including the 18 areas mapped as part of the Roadless Area Conservation Rule Final Environmental Impact Statement (all 18 of which had been previously identified during the Roadless Area Review and Evaluation of 1979 (RARE II)). Of the 67 areas considered, 8 potential Wilderness areas were identified for consideration for wilderness designation in the revision alternatives. Litigation of the Roadless Area Conservation Rule is pending and policy related to the Rule could change in the future. At this time, the Rule has been enjoined from implementation. Information regarding this alternative has been clarified in the FEIS.

**PC #: 37**

**Public Concern: The Final EIS should include the "Conservation Alternative."**

**Response:** Early in the revision process at public meetings, the Forests were asked whether they would be accepting complete alternatives for analysis in the range of alternatives. In order to avoid the appearance of catering to the interests of one group representing a relatively narrow vision for national forest management, any "alternatives" submitted were treated as a set of ideas to be considered in the development of a range of alternatives—not as an alternative management strategy in total to be considered during the revision process.

**PC #: 65**

**Public Concern: The Chequamegon-Nicolet National Forests should promote multiple-use management in each of the alternatives.**

**Response:** A wide range of alternatives with various levels of outputs and services addressing the plan revision topics of access and recreation opportunities, biological diversity, special land allocations, and timber production were analyzed in the DEIS and FEIS. Each of the alternatives in the DEIS and the FEIS meets the intent of various laws, including multiple use management, under which the national forests are managed. The Selected Alternative in the FEIS represents what the Forests' managers believe to be the best balance of outputs and services to achieve sustainable ecosystems, meet the intent of these laws, and address the issues and concerns specific to the management of the Chequamegon-Nicolet National Forests that were identified in the public concerns.

**PC #: 764**

**Public Concern: The Final EIS should consider alternatives not limited by the Report of the Scientific Roundtable.**

**Response:** The decision to revise the forest plan for the Chequamegon-Nicolet National Forests took many factors into consideration, including: 1) results of the *End of Decade Monitoring Report for the Chequamegon-Nicolet National Forest (1996)*, 2) changed conditions, 3) new information about the Forests and their uses, 4) legal requirements, 5) the need to more thoroughly consider the management of the forest in the broad context of the larger landscape in which they are situated, and 6) new or evolving agency policies. The *Report of the Scientific Roundtable on Biological Diversity Convened by the Chequamegon and Nicolet National Forests* was one of many "tools" used to address these factors during the plan revision process and development of alternatives.

**PC #: 381**

**Public Concern: The Final EIS should consider an alternative preserving 200,000 to 300,000 acres of old growth.**

**Response:** Frelich and Lorimer (1991) estimate that forty to sixty-eight percent of land in the Lakes States was in old growth in pre-settlement times. Forty to sixty-eight percent of the *forested* acres (excludes brushy lowlands, barrens, meadows or otherwise perennially open areas) on the Chequamegon-Nicolet National Forests is approximately 530,000 to 900,000 acres of land. The *Analysis of Management Situation: Old Growth Forests* states that "alternatives should explore the effects of old growth acreages at perhaps one-half and one third of the lower historic limit." One third to one half of the lower limit yields a range from 177,000 acres to 265,000 acres as the suggested total for old growth forest on the Chequamegon-Nicolet National Forests. All of the alternatives, with the exception of Alternative 1, allocate between 232,000 to 324,000 acres (after subtracting non-forested acres) of old growth and natural features complexes (MA 8G), research natural areas (MA 8E), special management areas (MA 8F), and developing old growth areas (5, 5B, 6A, 8D). Each of these management areas either protects existing old growth or has the potential to provide old growth conditions in the future. Alternative 1 provides only 141,000 acres of old growth or developing old growth.

**PC #: 421**

**Public Concern: The Final EIS should include a reasonable range of alternatives to comply with NEPA and the Planning Regulations.**

**Response:** The comments associated with this Public Concern were focused on the range of timber outputs considered during the revision process. The timber output considered for the first decade of plan implementation ranged from 1.22 billion board feet (Alternative 4) to 2.31 billion board feet (Benchmark 6). The timber outputs for the alternatives considered in detail are documented in Chapters 2 and 3 of the FEIS, and the Benchmark timber outputs are documented in Appendix B of the FEIS.

The "Alternatives Considered but Eliminated from Detailed Study" (Chapter 2 of the FEIS) documents the rationale for why alternatives with timber program outputs above what was determined to be the capability of the Forests under the 1986 Plans (1.46 billion board feet in the next decade) were eliminated from further detailed study.

**PC #: 713**

**Public Concern: The Final EIS should include a reasonable range of alternatives to comply with MUSYA and NFMA.**

**Response:** The core of the forest plan revision process is forming a set of forest management alternatives addressing the needs for change, each of which could potentially become the revised Forest Plan for the Chequamegon-Nicolet National Forests. Alternatives share goals, concepts, and policies that all national forests are directed to follow. Each of the alternatives in the DEIS and the FEIS meets the intent of various laws, including multiple use management, under which the national forests are managed. Alternative 1 is considered the no action alternative. It reflects the Forestwide direction from the 1986 Nicolet and Chequamegon Forest Plans and meets the NEPA requirement that a no action alternative be considered.

Alternatives 1 through 9 were analyzed based on the Need for Change and "Purpose and Need for Forest Plan Revision" as described in Chapter 1 of the DEIS. Four major topics were identified that needed to be addressed in the forest plan revision process: access and

recreation opportunities, biological diversity, special land allocations, and timber production.

**PC #: 240**

**Public Concern: The Chequamegon-Nicolet National Forests should conduct a thorough benchmark analysis before developing the range of alternatives to comply with 36 CFR 219.12.**

**Response:** The response to this Public Concern is located in the Allowable Sale Quantity section of this Appendix.

**PC #: 154**

**Public Concern: The Final EIS should include alternatives that fulfill the goals established concomitant with the creation of the Forest.**

**Response:** At the time of their creation, management of the Chequamegon and Nicolet 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 land 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 the United States Congress has passed a body of laws that require a broader natural resource focus when it comes to the management of national forest lands. 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 2004 Forest Plan fulfill the goals associated with the body of laws directing management of national forest lands, including the the Weeks Act and the Clarke-McNary Act.

**PC #: 466**

**Public Concern: The Final EIS should include an alternative that does not recommend any wilderness areas.**

**Response:** Alternative 1 does not recommend any additional areas for Wilderness study, and it is analyzed in the FEIS as part of the range of alternatives.

The National Forest Management Act Regulations (36 CFR 219.17) require that Roadless Areas within the National Forest System be evaluated and considered for recommendation as potential wilderness during the forest planning process. In addition, the 1984 Wisconsin Wilderness Act requires the Forest Service to revisit the Wilderness option when the forest plans are revised. Further Forest Service Manual 1923.03(2) states that areas recommended for Wilderness study are “not available for any use or activity that may reduce the area’s Wilderness potential”. As a result, areas recommended for Wilderness have been designated as Management Area 5B, which provides a wilderness-like experience within a semi-primitive, non-motorized recreation setting.

**PC #: 446**

**Public Concern: The Final EIS should include alternatives that designate research natural areas, as opposed to simply identifying them as candidates.**

**Response:** The FEIS contains the environmental effects analysis associated with designating all of the candidate RNAs as Research Natural Areas. More administrative work must be done to site-specifically designate these areas as RNAs. This includes description and survey of precise boundaries and development of an establishment record for each area that describes the characteristics of the area and type of activities that may or may not take place. There also needs to be an agreement between the Regional Forester and the North Central Research Station's Director that these areas fit the gaps in the national framework of RNAs. This work is not yet complete..

**PC #: 163**

**Public Concern: The Final EIS should include an alternative with large blocks of Management Area 2B to maintain interior forest species.**

**Response:** The response to this Public Concern can be found in the "Response to Multiple Public Concerns related to Management Area allocation" section.

**PC #: 444**

**Public Concern: The Chequamegon-Nicolet National Forests should consider alternatives that identify quantifiable objectives for managing sensitive species.**

**Response:** The primary means used by the Forest Service to promote sensitive species persistence/recovery is the provision of suitable habitat for the species and/or enhancing the connectivity between suitable habitat patches. Whether or not the species actually uses the available habitat is beyond the Forest Service's control, except for instances where efforts are made to introduce the species to the area through relocation from other areas or planting/seeding. For this reason, it is impractical to set population targets (objectives) for sensitive species such as those identified as Regional Forester Sensitive Species. However, the amount of habitat that exists and the amount that is being rehabilitated/created for a species can and will be quantified during implementation of the 2004 Forest Plan. In addition, allocations of management areas as well as details of management prescriptions, such as numbers of reserve trees, snag retention, and percent species composition are quantified in the 2004 Forest Plan and FEIS.

**PC #: 551**

**Public Concern: The Final EIS should provide direction for the recovery and viability of "Regional Forester Sensitive Species" in each alternative.**

**Response:** Goals and Objectives (Chapter 1) and Forestwide Standards and Guidelines (Chapter 2) in the 2004 Forest Plan provide direction for Regional Forester Sensitive Species. The Region 9 Regional Forester Sensitive Species Program (February 2002) also provides conservation direction on the National Forests by encouraging a combined coarse and fine filter interdisciplinary approach for species conservation and ecosystem management; and by providing tools to measure long-term ecosystem sustainability.



**PC #: 464**

**Public Concern: The Final EIS should ensure that each alternative benefits all old growth forest species' habitat.**

**PC #: 465**

**Public Concern: The Final EIS should include alternatives that increase timber management and the ASQ to biologically sustainable levels.**

**PC #: 471**

**Public Concern: The Final EIS should include an alternative that prohibits motor vehicle use off-road.**

**Response:** Alternatives 2 through 9 and the Selected Alternative prohibit off-trail/off-road ATV use. A wide range of alternatives addressing the plan revision topics of access and recreation opportunities, biological diversity, special land allocations, and timber production were analyzed in the DEIS and FEIS. Although levels of outputs and services vary, each of the alternatives in the DEIS and the FEIS meets the intent of various laws, including multiple use management, under which the national forests are managed. The Selected Alternative in the FEIS represents what the Forests' managers believe to be the best balance of outputs and services in achieving sustainable ecosystems and meeting the intent of these laws, as well as in addressing the issues and concerns specific to the management of the Chequamegon-Nicolet National Forests that were identified in the public concerns.

**PC #: 463**

**Public Concern: The Final EIS should consider alternatives that incorporate programs that monitor the distribution, status, and trends for all threatened, endangered, and sensitive species.**

**Response:** According to the National Forest Management Act Planning Regulations, "The primary goal of formulating alternatives, besides complying with NEPA procedures, is to provide an adequate basis for identifying the alternative that comes nearest to maximizing net public benefits, consistent with the resource integration requirements. . ." (36 CFR 219.12 (f)). The 2004 Forest Plan contains goals and objectives, standards and guidelines, and monitoring plans that address the protection of threatened, endangered, and sensitive species habitat.

**PC #: 445**

**Public Concern: The Final EIS should consider alternatives that do not promote the persistence and spread of invasive species through additional road and OHV trail construction.**

**Response:** Addressing the spread of invasive species is a decision that will be made most effectively on a site-specific basis. The 2004 Forest Plan is a programmatic document as opposed to a project level or site-specific document. Forest plan guidance provides general direction for the Forests (including objectives to treat NNIS sites and development of an NNIS strategy to guide amounts and locations of treatments) and at the same time allows for project level decisions that take into account site characteristics and situations unique to the project area. Implementation of the 2004 Forest Plan will result in reduced total road density on the Forests, and reduced open-road density (See Chapter 3 of the FEIS).

**PC #: 494**

**Public Concern: The Final EIS should include alternatives that require aspen harvest and rotation to preserve elk populations.**

**Response:** After 10 years of Forest Plan implementation under the Selected Alternative, approximately 38,600 acres of the 166,700-acre Elk Core Area are projected to be composed of aspen. This projection is very similar to the present aspen coverage of 38,900 acres. Although the overall acreage of aspen in the Elk Core Area only decreases by less than one percent, the location of the aspen will have begun to shift from areas designated as MA 2, 3, 4, 6 and 8 under the 1986 Plan to MA 1A, 1B, or 1C. Approximately 24% of the core area is designated as MA 1A, 1B and 1C in the Selected Alternative. Within MA 1, early successional forests dominate in a shifting mosaic pattern of age classes. Additional aspen stands established or maintained by fire, disease, and blowdown events will continue to be found to a lesser extent in other management areas within the core area. These unpredictable occurrences are not incorporated into the projections of aspen acreage.

**PC #: 634**

**Public Concern: The Final EIS should consider alternatives that manage habitat to reduce deer population densities.**

**Response:** Alternatives 2 through 9 and the Selected Alternative maintain ecological conditions that could result in local declines in deer populations and deer herbivory over the long term due to changes in available forage. White-tailed deer utilize young aspen browse and feed heavily on the growth produced in clearcuts. The Chequamegon-Nicolet National Forests is responsible for managing habitats for many wildlife species. The State of Wisconsin has the authority to manage wildlife populations, such as white-tail deer, and does so through actions such as setting goals, seasons, and the harvest, and by providing micro-management on State lands.

**PC #: 761**

**Public Concern: The Final EIS should include alternatives that address insect control.**

**Response:** Silvicultural treatments, such as those found in the 2004 Forest Plan, address insect and disease concerns by maintaining adequate growing space, nutrients, and light. Vigorously growing, healthy trees are less susceptible to insect and disease attacks. In the 2004 Forest Plan, an Objective (3.3c) has been established that requires the Forests to work cooperatively with federal, state, and county agencies and other non-governmental organizations for control of non-native invasive species such as the gypsy moth. Standards and Guidelines are also in place in the Plan to reduce the spread of non-native species and pest management.

Specific gypsy moth infestations can be best addressed during site-specific project level analysis. The Chequamegon-Nicolet National Forests will continue their partnerships with state and other federal agencies by applying gypsy moth treatments as part of the National “Slow the Spread” program, utilizing localized suppression efforts, and providing public education about how to minimize the spread of gypsy moths within the Forests.

**PC #: 32**

**Public Concern: The Final EIS should analyze the potential impacts of each alternative on game species' habitat.**

**Response:** From the sample comment that generated this public concern, it is understood that the commenter is concerned primarily with gamebirds such as grouse and woodcock. The effects of the Selected Alternative and 2004 Forest Plan on woodcock remain uncertain due to the incomplete understanding of the species' habitat requirements (See *Analysis of the Impacts on Avifauna of Reduced Young Aspen Coverage in Wisconsin in the planning record*). With respect to ruffed grouse, a reduction in the emphasis on early successional forest may have a small impact on population sizes. However, it is important to note that ruffed grouse population sizes are cyclic and these cycles are independent of aspen abundance. It is also important to note that under the current management direction (Alternative 1), there would be 331,700 acres of aspen on the Forests in 10 years. Under the Selected Alternative and 2004 Forest Plan, 329,900 acres would be aspen in 10 years. These two alternatives differ by only about 0.5 % and, in fact, none of the alternatives vary by more than 1.6% from the current management direction. These aspen projections are derived from a model that does not account for the generation of aspen from fire, blowdown, or other natural disturbances; therefore these totals represent conservative estimates of aspen on the Forests. Since the 2004 Forest Plan will be revised in about 15 years, it is difficult to envision any great changes in the abundance of ruffed grouse as a result of the reduced emphasis on early-successional habitats.

**PC #: 447**

**Public Concern: The Final EIS should state that the Canada lynx and the Kirtland's warbler habitats vary throughout the alternatives.**

**Response:** The Forest Service acknowledges that the alternatives vary in the amount of potential habitat for these species and has modified the 2004 FEIS Summary accordingly.

**PC #: 28**

**Public Concern: The Final EIS should include an alternative that protects browse-sensitive understory plant species.**

**Response:** Through the designation of MA 2B areas, the intensity of deer herbivory on understory plant species is expected to be lessened. Alternative 5 was designated as the Preferred Alternative to serve as the Proposed Plan in draft documents.

In response to comments received on the Proposed Plan and Draft Environmental Impact Statement, an additional alternative was developed by modifying Alternative 5, the Preferred Alternative in the DEIS. This new alternative is called the Selected Alternative. One of the changes between the Preferred Alternative and the Selected Alternative was the addition of approximately 79,000 acres of MA 2B. Over time, these MA 2B areas and other management areas where timber harvest is infrequent or prohibited (MA 5, 5B, 6A, 8E, 8F, 8G) will become less attractive to deer, possibly leading to reduced browse pressure. It is important to note that increased hunting pressure, severe winters, and disease can also play a major role in reducing deer abundance and their impacts on understory flora.

**PC #: 38**

**Public Concern: The Final EIS should consider alternatives that meet the needs of both early and late successional species.**

**Response:** Ecosystem Restoration and Landscape Patterns were two components of Biological Diversity that were addressed in the forest plan revision process. The *Report*

on the *Scientific Roundtable on Biological Diversity Convened by the Chequamegon and Nicolet National Forests* (1994) states that northern Wisconsin forests today are more fragmented, younger, more even-aged, and contain more early successional trees than the mostly mature to old-growth forest that they replaced. Because species native to northern Wisconsin are adapted to the disturbance regimes, forest structures, and landscape patterns of the pre-settlement forest, declines of many of the species on the Regional Forester's Sensitive Species list are attributed to the stark difference between the existing and ancestral conditions.

Intensive management for early successional forest types was judged by the *Roundtable* scientists as having severe impacts on the biodiversity of the Forests. Under the Selected Alternative, the needs of species associated with early successional forest will continue to be met on the Forests through natural disturbances and management area emphases (allocations to MA 1A, 1B, and 1C amount to approximately 20% of the total land base), and maintaining a component of early successional forest types within other MAs. In addition, significant improvements are made in meeting the needs of late successional species (which are often edge sensitive). These improvements are achieved through large block management, allowing some areas of the Forests to naturally succeed to late successional forest types, increasing allocations to old growth and developing old growth areas, and promoting greater structural and compositional diversity within stands of all age classes.

**PC #: 36**

**Public Concern: The Final EIS should consider alternatives that emphasize interior forest restoration.**

**Response:** Interior forest restoration is the emphasis of Management Area 2B and to a lesser degree in MA 3B and 4B.

**PC #: 29**

**Public Concern: The Final EIS should consider alternatives proposing an increase in timber production.**

**PC #: 140**

**Public Concern: The Forest Plan should increase logging.**

**Response:** Timberland suitability determinations for each of the alternatives are displayed in Appendix M (Table M-1) of the Final Environmental Impact Statement. As directed by the Multiple-Use Sustained-Yield (MUSY) Act, national forests are to be "administered for outdoor recreation, range, timber, watershed, and wildlife and fish". The timberland suitability determination is one of the first steps in explaining how the various alternatives go about trying to achieve the best balance of providing for these resources. Providing only high levels of timber outputs would not accomplish the mission of the Forest Service as directed by the MUSY Act. All the components of the different alternatives provide for a different mix of resource objectives/outputs.

Timber production was one of the four major forest plan revision topics identified in the Notice of Intent (NOI). Ten problem statements were later established, as part of the development of alternatives, which elaborate on the details of the NOI topics. Under the umbrella of the Timber Production topic, two problem statements were developed: Timber Management and Special Forest Products.

The Timber Management problem statement addresses the need to update the assumptions made in the identification of suited lands as well as estimation of growth and

yield. On the Chequamegon, the amount of volume produced per acre over the life of the 1986 Forest Plan was less than projected so more acres were treated than projected. On the Nicolet, the volume per acre produced was fairly accurate but the number of acres available (with a merchantable harvest) was less than projected. The Nicolet Forest Plan included more suited acres in the volume determination than were actually available.

The commenter suggests that Alternative Management Areas 2B, 3B and 4B (AMAs) have been effectively removed from the suited forestlands. However, the AMAs are not removed from the suited forestlands. They allow for timber management but, as discussed in the “Timber and Related Products—Proposed Changes” section in Chapter 3 of the FEIS, the productivity, quantity, and quality of the timber that could be potentially produced in these areas may be reduced. The AMAs represent the trade-off between providing timber output and providing for other resources as directed by the National Forest Management Act, MUSY Act, and as highlighted in the *Report on the Scientific Roundtable on Biological Diversity Convened by the Chequamegon and Nicolet National Forests* (1994).

While it is true aspen will be managed using an extended rotation in MA 2A, all other species will be managed using the standard rotation ages, some of which are lower than the 1986 plans. Of the 175,000 acres in Management Area 2A in the Selected Alternative, only 28,000 are composed of aspen that will be managed using an extended rotation age.

To address timber industry concerns about uneven-aged hardwood management, most management areas with suited forestlands apply a new desired size class structure table (2004 Forest Plan, Table 2-4). This table reduces the maximum size of the residual crop trees in hardwood uneven-aged management to 22 inches (1986 Plans used 24 inches). The projected annual average allowable volumes for the Nicolet in the first decade range from 48 to 67 MMBF in the range of alternatives, is higher than the current volume offered on this forest.

**PC #: 43**

**Public Concern: The Final EIS should include an alternative prohibiting timber harvest.**

**PC #: 33**

**Public Concern: The Final EIS should include alternatives that emphasize multiple use of the forest.**

**Response:** A wide range of alternatives addressing the plan revision topics of access and recreation opportunities, biological diversity, special land allocations, and timber production were analyzed in the DEIS and FEIS. Although levels of outputs and services vary across the alternatives, each meets the intent of various laws, including emphasis on multiple use management, under which the National Forests are managed. The 2004 Forest Plan and FEIS represent what the Forests’ managers believe to be the best balance of outputs and services in meeting the intent of these laws, including maximizing net public benefits and addressing the issues specific to the management of the Chequamegon-Nicolet National Forests that were identified in the public concerns.

**PC #: 633**

**Public Concern: The Final EIS should consider alternatives that restrict logging unless on frozen ground.**

**Response:** Page 27 of the *Report on the Scientific Roundtable on Biological Diversity Convened by the Chequamegon-Nicolet National Forest* (1994) recommends winter

logging “when possible” to reduce the destructive impacts of heavy equipment on the forest floor and mineral soil. A Forestwide Guideline in Chapter 2 of the 2004 Forest Plan states, “During timber harvest operations operate heavy equipment only when soil is not saturated, or when the ground is frozen.” In addition, guidelines for Management Area 2B restrict logging of northern hardwood sites to frozen ground conditions. Allocation of MA 2B varies across alternatives based on the emphasis placed on restoration of interior northern hardwood forest. There are 209,000 acres of MA 2B in the Selected Alternative.

**PC #: 718**

**Public Concern: The Final EIS should include alternatives that address harvest levels and silvicultural treatments necessary for forest health.**

**Response:** The FEIS considers a range of allowable timber sale quantities (ASQ) from 1.22 billion board feet (BBF) to 2.31 BBF over the first decade following the revision of the Plans. The range of ASQs that were considered in detail was 1.22 to 1.46 BBF, and the rationale is explained in Chapter 2 of the FEIS. 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.

**PC #: 563**

**Public Concern: The Final EIS should include alternatives that explore high-yield timber management options.**

**Response:** Timber production was one of the four major forest plan revision topics identified in the Notice of Intent (NOI). Ten problem statements were later established, as part of the development of alternatives, which elaborate on the details of the NOI topics. Under the umbrella of the Timber Production topic, two problem statements were developed: Timber Management and Special Forest Products.

The Timber Management problem statement addresses the need to update the assumptions made in the identification of suited lands as well as estimation of growth and yield. On the Chequamegon, the amount of volume produced per acre over the life of the 1986 Plan was less than projected so more acres were treated than projected. On the Nicolet, the volume per acre produced was fairly accurate but the number of acres available (with a merchantable harvest) was less than projected. The Nicolet 1986 Plan included more suited acres in the volume determination than were actually available.

To address timber industry concerns about uneven-aged hardwood management, most management areas with suited forestlands apply a new desired size class structure table (2004 Forest Plan Table 2-4). This table reduces the maximum size of the residual crop trees in hardwood uneven-aged management to 22 inches (1986 Plans used 24 inches). Rotation ages were also re-examined during the revision process and some of the standard rotation ages have actually been decreased to increase the productivity of the Forests. These standard rotation ages are applied to the majority of the Forests.

The Forests also developed a set of extended rotation ages to be used in Alternative Management Areas (AMAs). While these AMAs are considered suited forestlands, the objective for these areas is to produce benefits for other resource concerns while continuing to provide timber outputs. The average net volume output for AMAs is approximately 22% less than timber output on other suited forestlands, in order to provide mature and old growth forest components in a managed setting. In addition, another new uneven-aged hardwood structure table was developed (2004 Forest Plan, Table 2-5) for application within the AMAs and Management Area 6B (Semi-



Primitive Non-Motorized, moderate disturbance). This table increases the maximum size of the residual crop trees in uneven-aged northern hardwood stands to 25 inches (1986 Plans used 24 inches).

Some management areas prohibit or restrict timber harvest activities. Such “no harvest zones” all have a specific purpose for meeting the needs of the resources the Forest Service is to provide for and protect. The amount of these “no harvest zones” varies by alternative as we strive to reach the best balance of land allocation to fit the needs of various resources and the people.

High yield forestry which is practiced on industry lands is imbedded into some of our practices but as a general rule the National Forests should not be thought of as a timber fiber factory. The National Forests have many more objectives than just timber production.

**PC #: 441**

**Public Concern: The Final EIS should include alternatives that promote aggressive hardwood management.**

**Response:** Aspects of this Public Concern that relate to the range of timber outputs considered during revision are addressed under PC# 421. The 2004 Forest Plan provides for an Allowable Sale Quantity (volume permitted to be harvested during the next decade) of 520 million board feet on the Nicolet and 790 million board feet on the Chequamegon. If production is at ASQ levels, hardwood product outputs during the first decade are estimated to be up to 580 million board feet, about 44% of the projected species-product mix. Projections out to the 15<sup>th</sup> decade would increase this hardwood output to 1070 million board feet, constituting about 54% of the projected ASQ for that decade. This demonstrates a long-term projection of increased overall timber output, as well as an increase in the proportion of it occurring as hardwoods.

Under the 2004 Forest Plan, the hardwood production for the next decade is predicted to consist of about 14 percent sawtimber, and in the 15<sup>th</sup> decade this percentage is projected to increase to about 49 percent sawtimber (if the same management emphases were carried out that long). This further demonstrates the long-term projection of providing hardwood timber management and an increasing output of quality hardwood sawtimber. Only Alternative 2 has as high a long-term hardwood product output. Alternative 1, which follows the management direction of the current (1986) Plans, is projected to produce less hardwood outputs over the long-term than the 2004 Forest Plan.

**PC #: 31**

**Public Concern: The Final EIS should include alternatives that strictly limit off-highway vehicle use.**

**Response:** The use of Off-Highway Vehicles (OHVs) and All-Terrain Vehicles (ATVs) is recognized as an acceptable and legitimate use of our National Forests. Although none of the alternatives considered in the EIS propose cutting back the existing ATV trail system on the Chequamegon, the 2004 Forest Plan will effectively limit OHV use on the Forests by prohibiting all off-road/off-trail travel. Confining OHV use to designated trails and road routes will concentrate OHV use in appropriate places so any consequent impacts can be carefully monitored and controlled. A Monitoring Plan of Operations will be prepared each year to monitor the condition of ATV/OHV travelways, impacts on forest resources, and gather data needed to evaluate the effectiveness of management decisions.

**PC #: 34**

**Public Concern: The Final EIS should include alternatives that expand off-highway vehicle access.**

**Response:** Alternatives that expanded off-highway vehicle (OHV) access were considered in the early stages of analysis but eliminated from further detailed study in the EIS. (See “Alternatives Considered but Eliminated from Detailed Study” in Chapter 2 of the FEIS.) The levels of off-highway vehicle access provided by these alternatives were found to be incompatible with the recreational and ecological goals for the Forests. Instead, alternatives were considered that explored options for OHV use on the Forests that balance the needs of OHV users with those of other forest users, resource protection objectives, and legislative requirements. The FEIS provides an adequate range of alternatives.

**PC #: 462**

**Public Concern: The Final EIS should include an alternative that restricts additional road construction and limits road density.**

**Response:** Early in the plan revision process, it was determined that the existing road density of 3.0 miles/square miles on the Chequamegon-Nicolet National Forests was still valid, and that this goal was not a part of the Need for Change in the 1986 Forest Plans. This goal will require further reductions of road mileage, over time, on the Forests, since total road density is still above 3.0 miles /square mile. Since total road density was not seen as part of the Need for Change, it was not part of the Purpose and Need for the FEIS, and would be beyond the scope of the Purpose and Need for this revision of Forest Plans.

**PC #: 35**

**Public Concern: The Final EIS should analyze the potential social and economic impacts of each alternative on local communities.**

**Response:** Compared to CNNFs’ current levels of production and management, there is the potential for an increase in area jobs and income for all Alternatives, as well as potential for increasing payments to the counties from the 25% Fund Act (1908) and Payments in Lieu of Taxes Act of 1976 (PILT). (See the “Social and Economics Analysis” section in Chapter 3 of the FEIS for details.) There is a loss of ‘potential’ for more jobs in Alternatives 2-9 and the Selected Alternative when compared to Alternative 1, which is based on the 1986 Plan including modified ASQ projections due to incorporation of assumptions based on 15 years of implementation.

CNNF-contributed recreation opportunities can be indicators of tourism. ‘Tourism’ itself includes revenues from restaurants, hotels, merchandise, and so on that are tied to the actual recreation activities (i.e. ATV, skiing, hiking, hunting, etc). Since the CNNF has no restaurants or hotels from which to generate revenue, these external monies were not examined in this EIS and therefore a total ‘tourism’ analysis was not conducted. Only those recreation activities provided by the CNNF were considered part of the revenues included in the economic analysis for this Forest Plan.

Also, the Forest Service is not responsible for the levying of taxes. Management decisions by the CNNF are not reflected in the increase or decrease of taxes to the private household. The possible lost revenues from taxes to local governments, however, are addressed by the 25% Fund, PILT, and, more recently, the Secure Rural Schools and Community Self-Determination Act of 2000 (SRSCS). (See Chapter 3 of the FEIS for more details).

**PC #: 156**

**Public Concern: The Chequamegon-Nicolet National Forests should adopt a new alternative with aspects of Alternatives 3 and 4.**

**Response:** A wide range of alternatives with different levels of outputs and services and varying management area allocations were analyzed in the DEIS and FEIS. Each of the alternatives in the DEIS and the FEIS addresses the plan revision topics of Access and Recreation Opportunities, Biological Diversity, Special Land Allocations, and Timber Production and meets the intent of various laws, including multiple use management, under which the national forests are managed. The Selected Alternative in the FEIS was developed by modifying Alternative 5, the Preferred Alternative in the DEIS, based on comments received on the Proposed Forest Plan and DEIS. The Selected Alternative represents what the Forests' managers believe to be the best balance of outputs and services to achieve sustainable ecosystems, meet the intent of various laws, and to address the issues and concerns specific to the management of the Chequamegon-Nicolet National Forests that were identified in the public concerns.

**PC #: 719**

**Public Concern: The Final EIS should include an alternative that promotes multiple-use, sustainable forest management, long-term environmental health, and economic viability for Wisconsin.**

**Response:** 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." This means that the National Forests will be managed to provide for the use of all the various renewable surface resources in a combination that best meets the needs of the American people. The 2004 Forest Plan provides a balance between competing concerns while managing for biological diversity, off-road vehicles, timber harvest, and non-motorized recreation.

**PC #: 472**

**Public Concern: The Final EIS should include a new alternative based on Alternatives 5 and 6.**

**PC #: 477**

**Public Concern: The Final EIS should include a new alternative based on Alternatives 5 and 9.**

**PC #: 483**

**Public Concern: The Final EIS should combine elements of Alternatives 1 through 5 to create an alternative that restricts noise pollution.**

**Response:** A wide range of alternatives with various levels of outputs and services and varying management area allocations were analyzed in the EIS. Each of the alternatives in the DEIS and the FEIS addresses the four major plan revision topics and meets the intent of various laws, including multiple use management, under which the national forests are managed. The Selected Alternative in the FEIS was developed by modifying Alternative 5, the Preferred Alternative in the DEIS, based on comments received on the Proposed Forest Plan and DEIS. The Selected Alternative represents what the Forests' managers believe to be the best balance of outputs and services to achieve sustainable ecosystems, meet the intent of various laws, and to address the issues and concerns specific to the management of the Chequamegon-Nicolet National Forests that were identified in the public concerns.

**PC #: 479**

**Public Concern: The Final EIS should substantiate the Alternative Management Area to Mature Northern Hardwoods acreage ratios in Alternatives 3 and 5.**

**Response:** Alternative Management Areas, defined as Management Areas 2B, 3B, 4B and 4C, are not synonymous with acreage of northern hardwood or “interior” northern hardwoods. Of those four Management Areas, only MA 2B emphasizes management for northern hardwood interior forest.

Patches of northern hardwood species are also allocated to other management areas, such as MA 2A, with the amount depending on the alternative. Northern hardwood trees in those areas also age as time goes by and also contribute to the total acreage of future mature northern hardwood interior forest.

In each alternative, except for Alternative 1, Management Area 2B was allocated in areas where large hardwood patches now exist; Alternative 3 allocates approximately 320,000 acres more MA 2B than Alternative 5. Management Area 2A was also allocated to areas where northern hardwoods predominate; Alternative 5 allocates almost 200,000 acres more MA 2A than Alternative 3. Therefore, even though MA 2B allocation varies by approximately 320,000 acres between Alternatives 3 and 5, the amount of MA 2A in Alternative 5 is enough to offset differences between the alternatives in the amount of interior northern hardwoods in 100 years. HARVEST projections show a difference of 20,000 acres of interior northern hardwoods between Alternatives 3 and 5 at the end of 100 years.

**PC #: 485**

**Public Concern: The Final EIS should clarify the rankings for Alternatives 4, 5, and 9.**

**Response:** Your point is well taken and the Summary of the FEIS has been edited for clarity.

## Specific Alternatives

### Alternative 1

**PC #: 39**

**Public Concern: The Chequamegon-Nicolet National Forests should adopt Alternative 1.**

**PC #: 496**

**Public Concern: The Chequamegon-Nicolet National Forests should not adopt Alternative 1.**

**Response:** A wide range of alternatives with various levels of outputs and services, varying management area allocation, and different ways of addressing the plan revision topics (Access and Recreation Opportunities, Biological Diversity, Special Land Allocations, and Timber Production) were analyzed in the DEIS and FEIS. Each of the alternatives in the DEIS and the FEIS meets the intent of various laws, including multiple use management, under which the national forests are managed. The Selected Alternative in the FEIS was developed by modifying Alternative 5, the Preferred Alternative in the DEIS, based on comments received on the Proposed Forest Plan and accompanying documents. It represents what the Forests’ managers believe to be the best balance of outputs and services to achieve sustainable ecosystems, meet the intent of various laws,

and to address the issues and concerns specific to the management of the Chequamegon-Nicolet National Forests that were identified in the public concerns.

## **Alternative 2**

**PC #: 44**

**Public Concern: The Chequamegon-Nicolet National Forests should adopt Alternative 2.**

**PC #: 155**

**Public Concern: The Chequamegon-Nicolet National Forests should adopt Alternative 2, modified to include additional natural pine management (4B) areas.**

**Response:** Many comments were received from respondents expressing a clear preference for, or opposition to, a specific alternative considered in the DEIS. This information was used to gauge public values, beliefs, and attitudes on issues germane to plan revision and to identify themes and ideas that were either not included in the draft documents or were not presented clearly and understandably. The final record of decision and Selected Alternative incorporate elements of different alternatives (particularly Alternative 5) that best combine to maximize net public benefits, remain consistent with resource integration and management requirements, and comply with stated goals and objectives.

**PC #: 596**

**Public Concern: The Forest Plan should adopt Alternative 2's semi-primitive non-motorized area designations.**

**Response:** Many comments were received from respondents expressing a clear preference for, or opposition to, a specific alternative considered in the DEIS. This information was used to gauge public values, beliefs, and attitudes on issues germane to plan revision and to identify themes and ideas that were either not included in the draft documents or were not presented clearly and understandably. The 2004 Forest Plan (Selected Alternative) incorporates aspects of different alternatives (particularly Alternative 5) that best combine to maximize net public benefits, remain consistent with resource integration and management requirements, and comply with stated goals and objectives.

## **Alternative 3**

**PC #: 46**

**Public Concern: The Chequamegon-Nicolet National Forests should adopt Alternative 3.**

**Response:** A wide range of alternatives with various levels of outputs and services, varying Management Area allocation, and different ways of addressing the plan revision topics (Access and Recreation Opportunities, Biological Diversity, Special Land Allocations, and Timber Production) were analyzed in the DEIS. Each of the alternatives in the DEIS and the Final EIS meets the intent of various laws, including multiple use management, under which the national forests are managed. The Selected Alternative in the FEIS was developed by modifying Alternative 5, the Preferred Alternative in the DEIS based on comments received on the Proposed Forest Plan and accompanying documents. The Selected Alternative represents what the Forests' managers believe to be the best balance of outputs and services to achieve sustainable ecosystems, meet the

intent of various laws, and to address the issues and concerns specific to the management of the Chequamegon-Nicolet National Forests that were identified in the public concerns.

**PC #: 500**

**Public Concern: The Chequamegon-Nicolet National Forests should modify Alternative 3 to restrict logging in Management Area 6A.**

**Response:** Standards and guidelines for Management Area 6A specify that timber harvesting may take place on rare occasions if:

1. The proposed harvest focuses on cutting trees in order to maintain or improve roadless or semi-primitive area characteristics, improve threatened, endangered, and Regional Forester Sensitive Species habitat, or restore ecosystem composition and structure characteristics;
2. The cutting, sale, or removal of timber is incidental to the implementation of a management activity;
3. The timber harvesting is needed for public protection, pest control management, or to create desired conditions for tree regeneration following catastrophic events such as wind or fire.

These standards and guidelines apply to all areas designated as Management Area 6A in all of the alternatives except Alternative 1. See Chapter 3 of the 2004 Forest Plan, “Management Area 6”, for more information.

**PC #: 501**

**Public Concern: The Chequamegon-Nicolet National Forests should modify Alternative 3 to protect 15,000 to 20,000 acres of forest.**

**Response:** The respondent indicates that the amount of recommended area for wilderness study in Alternative 3 is too low. Individual comments and concerns, including suggestions for the amount of wilderness needed on the Forests, were used in the development of the Selected Alternative and 2004 Forest Plan. The 2004 Forest Plan incorporates aspects of different alternatives (particularly Alternative 5) that best combine to maximize net public benefits, remain consistent with resource integration and management requirements, and comply with stated goals and objectives. In the 2004 Forest Plan there are 15,500 acres of recommended Wilderness; see the “Wilderness” section in Chapter 3 of the FEIS for more information.

**PC #: 497**

**Public Concern: The Chequamegon-Nicolet National Forests should modify Alternative 3 to restrict logging in Management Area 2B and protect 400,000 acres of forest.**

**Response:** The Response to this Public Concern is located in the “Harvest Methods” section of this Appendix.

**PC #: 47**

**Public Concern: The Final EIS should clarify how Alternative 3 can offer a low ASQ and designate a high acreage for timber production.**

**Response:** The relationship between ASQ and treated acres is nearly identical between Alternatives 3 and 5, and the Selected Alternative. Alternative 5 (Preferred Alternative in the DEIS) treats 1,200 more acres per year than Alternative 3. The volume produced is proportional to the acres treated within each of these alternatives.



**PC #: 726**

**Public Concern: The Chequamegon-Nicolet National Forests should modify Alternative 3 to reduce road densities, protect landscape analysis and design, and prohibit road construction and logging in old growth areas.**

**Response:** In the development of the Selected Alternative from Alternative 5, over 101,000 acres of Alternative Management Areas (AMAs; MA 2B, 3B, 4B and 4C) were added. This brings the total acreage of AMAs up to about 263,000 acres, which is approximately 18% of the total Forest land base. Under Alternative 5, approximately 11% of the land base was designated as AMA. The additional AMAs were chosen based on their 1) overlap with ecological reference areas (MA 8E, 8F and 8G), 2) vegetation composition and landscape-scale structure, 3) rank in the Landscape Analysis and Design Inventory, 4) presence of inventoried sensitive species and 5) amenability to community restoration.

A wide range of alternatives with various levels of outputs and services addressing the plan revision topics of Access and Recreation Opportunities, Biological Diversity, Special Land Allocations, and Timber Production were analyzed in the DEIS and FEIS. Each of the alternatives in the DEIS and the FEIS meets the intent of various laws, including multiple use management, under which the national forests are managed. The Selected Alternative in the FEIS represents what the Forests' managers believe to be the best balance of outputs and services to achieve sustainable ecosystems, meet the intent of these laws, and to address the issues and concerns specific to the management of the Chequamegon-Nicolet National Forests that were identified in the public concerns.

**PC #: 735**

**Public Concern: The Chequamegon-Nicolet National Forests should modify Alternative 3 to increase water resource protection, reduce deer population density, and prohibit logging in sensitive species' habitat.**

**Response:** The 2004 Forest Plan includes standards and guidelines that protect aquatic ecosystems, limit disturbances (including logging) in the habitats of sensitive species, and, through management area designation, attempt to reduce the potential impacts of deer on sensitive plants. These standards and guidelines were modified to better protect resources and to reduce ambiguities that could have lead to improper implementation of the Plan. The forestwide standards and guidelines developed for the 2004 Forest Plan would not differ among Alternatives 2-9 and the Selected Alternative. These alternatives would, however, vary in their management area allocations.

In general, the Selected Alternative is the result of modifications to Alternative 5 that are in the direction of Alternative 3. For instance, the Selected Alternative allocates over 79,000 additional acres of MA 2B than Alternative 5, moving it in the direction of Alternative 3. Based on the assumptions that more MA 2B affords greater reductions in deer density and provide more suitable habitat for edge sensitive species than many other management areas, the Selected Alternative will respond to these issues better than Alternative 5 but not as well as Alternative 3.

**PC #: 739**

**Public Concern: The Chequamegon-Nicolet National Forests should modify Alternative 3 to restrict OHV use on the Nicolet National Forest and limit OHV use on the Chequamegon National Forest.**

**Response:** Demand for ATV access to the Nicolet has risen rapidly since the 1986 Forest Plan was signed. The effects of restricting all OHV use on the Nicolet were analyzed in

Alternatives 1 and 4. All other alternatives considered in the EIS proposed an increase in OHV access on the Nicolet in order address the legitimate demands of OHV users.

Forestwide, every alternative other than Alternative 1 (No Action alternative), limits use of Off Highway Vehicles (OHV) on the Chequamegon-Nicolet to designated roads and trails under a “closed unless posted open” policy. This policy will provide consistent management direction for the Chequamegon-Nicolet, help meet the legitimate demands for ATV/OHV access on both Forests, and protect against resource damage and user conflicts caused by unrestricted use. Comments received on the alternatives considered in the DEIS were used to determine the levels of OHV access most consistent with public opinion. This information is reflected in the Selected Alternative, which incorporates elements of different alternatives (particularly Alternative 5) to maximize net public benefits, remain consistent with resource integration and management requirements, and comply with stated goals and objectives.

**PC #: 741**

**Public Concern: The Chequamegon-Nicolet National Forests should modify Alternative 3 to protect the Ice Age and North Country Trail corridors.**

**Response:** The response to this Public Concern is located in the “National Scenic Trails” section of this Appendix.

**PC #: 743**

**Public Concern: The Chequamegon-Nicolet National Forests should modify Alternative 3 to recommend all RARE II areas for wilderness designation.**

**Response:** None of the RARE II areas fully met the criteria for consideration in the 2002 Roadless Area Inventory and Wilderness Evaluation. However, two of the RARE II areas, Flynn Lake and St. Peter’s Dome, had characteristics that were notable enough for them to be considered in the Wilderness evaluation process by exception. Flynn Lake is the only area that is identified as a Recommended Wilderness Study Area (MA 5B) in the 2004 Forest Plan. St. Peter’s Dome is identified as a Semi-Primitive Non-Motorized Area (MA 6A) in Alternatives 2-9 and the Selected Alternative.

## Alternative 4

**PC #: 49**

**Public Concern: The Chequamegon-Nicolet National Forests should adopt Alternative 4.**

**Response:** Each alternative places a different emphasis on certain outputs or topics such as potential wilderness, motorized recreation, or biological diversity. Because of the different ways in which the action alternatives (i.e., Alternatives 2-9 and the Selected Alternative) respond to the plan revision topics or issues, many respondents indicated a clear preference for, or opposition to, a specific alternative considered in the DEIS. These comments and concerns were taken into consideration during the formulation of the Selected Alternative and were used by forest specialists to revise and improve the EIS and forest plan between draft and final versions. The 2004 Forest Plan incorporates aspects of different alternatives (particularly Alternative 5) that best combine to maximize net public benefits, remain consistent with resource integration and management requirements, and comply with stated goals and objectives.

**PC #: 746**

**Public Concern: The Chequamegon-Nicolet National Forests should modify**

**Alternative 4 to designate additional wilderness areas and fewer acres for timber production.**

**Response:** Acres recommended for Wilderness study vary across alternatives from 0 acres in Alternative 1 to 56,100 acres in Alternative 4. Of the alternatives considered in the DEIS, Alternative 4 places the most emphasis on the designation of potential wilderness areas; all eight of the areas on the Forests that were found to meet minimum roadless standards in the 2002 Roadless Area Inventory and Wilderness Evaluation were designated as recommended Wilderness. Alternatives that provide for potential wilderness study areas above and beyond those called for by Alternative 4 were not considered during the plan revision process. (See “Alternatives Considered but Eliminated from Detailed Study” in Chapter 2 of the FEIS.)

**Alternative 5**

**PC #: 54**

**Public Concern: The Chequamegon-Nicolet National Forests should adopt Alternative 5.**

**PC #: 507**

**Public Concern: The Chequamegon-Nicolet National Forests should not adopt Alternative 5.**

**PC #: 542**

**Public Concern: The Forest Plan should incorporate recommendations by the Biodiversity Round Table.**

**PC #: 63**

**Public Concern: To protect environmental integrity, the Chequamegon-Nicolet National Forests should adopt an alternative other than 5.**

**Response:** A wide range of alternatives with various levels of outputs and services were analyzed in the DEIS. Each alternative responds to the plan revision topics (Access and Recreation Opportunities, Biological Diversity, Special Land Allocation, and Timber Production) and incorporates recommendations of the Scientific Roundtable on Biodiversity. Alternative 5, the Preferred Alternative in the DEIS, was modified and is displayed as the “Selected Alternative” in the FEIS. The 2004 Forest Plan and FEIS reflect response to comments received on the Draft Plan and Draft Environmental Impact Statement. Some of the changes between the Preferred Alternative and the Selected Alternative are:

Allocation of Management Areas 2B, 3B, and 4B increases by more than 100,000 acres;

Increase in the potential miles of new ATV trails on the Forests;

Use of an Adaptive Management Approach to route designation on the Forests to help find a level of ATV/ORV access that satisfies the demand for additional recreation opportunities without causing enforcement concerns, unacceptable resource damage, or conflicts with other forest visitors;

No net gain in miles of 4-Wheel Drive vehicle routes;

Changes in allocation of specific Recommended Wilderness areas with total acreage remaining about the same;

Changes in allocation of specific MA 6A and 6B areas and a decrease in amount of Non-Motorized with Full Vegetation Management areas.

The Selected Alternative in the FEIS represents what the Forests' managers believe to be the best balance of outputs and services to achieve sustainable ecosystems, meet the intent of laws, and address the issues and concerns specific to the management of the Chequamegon-Nicolet National Forests that were identified in the Purpose and Need and public concerns. See the FEIS for more detailed information.

**PC #: 767**

**Public Concern: The Chequamegon-Nicolet National Forests should modify Alternative 5 to include additional Management Area 2B and expand existing wilderness areas.**

**Response:** The 2004 Forest Plan incorporates aspects of different alternatives (particularly Alternative 5) that best combine to maximize net public benefits, remain consistent with resource integration and management requirements, and comply with stated goals and objectives. Alternative 5, the Preferred Alternative in the DEIS, was modified and is displayed as the "Selected Alternative" in the FEIS. Although acres of potential wilderness and low disturbance semi-primitive non-motorized areas (MA 6A) in the Selected Alternative remain about the same as in Alternative 5 (DEIS Preferred Alternative), acres of MA 2B increase by almost 80,000 acres over Alternative 5 allocations. Two of the potential wilderness areas included in the 2004 Forest Plan will expand existing wilderness areas, providing larger tracts of unmanaged forests for the benefit of human visitors and a wide variety of plant and animal species.

**PC #: 545**

**Public Concern: The Final EIS should designate the polygon surrounding the Argonne Esker as Management Area 6B-2B in Alternative 5.**

**Response:** Of the area including and surrounding the Argonne Esker (Nicolet Polygon 34 and part of 39), approximately 4,000 acres are designated as either Research Natural Areas (RNA; MA 8E) or Old Growth & Natural Feature Complexes (MA 8G) in the 2004 Forest Plan. Also in this area is the North Branch Popple River Wild and Scenic River Corridor (MA 8D; polygon 39). The rest of Polygon 34 is designated as Management Area 2A, a management prescription that emphasizes interior northern hardwoods (see Chapter 3 of the 2004 Forest Plan). These designations were determined to meet the management objectives of the Forests while maintaining and enhancing the integrity of the Argonne Esker. Although the area will not be closed to motorized vehicles, 1) no new roads will be constructed in MA 8D and 8E, 2) no new motorized trails or routes will be located in MA 8D, 8E, or 8G, 3) motorized vehicles are not permitted on RNA trails, 4) National Forest roads within MA 8G will be managed at Maintenance Level 2, and 6) overall interior road density in MA 8D areas will not exceed 2.0 miles of classified road per square mile of national forest land.

**PC #: 531**

**Public Concern: The Chequamegon-Nicolet National Forests should ensure that Alternative 5 designates enough Alternative Management Areas to protect species and habitat.**

**PC #: 427**

**Public Concern: The Final EIS should omit highly disturbed, plantation-dominated landscapes from Alternative Management Area consideration.**

**Response:** Alternative Management Areas (AMAs) were chosen based on their 1) vegetation composition and landscape-scale structure, 2) presence of inventoried sensitive species, 3) rank in the Landscape Analysis and Design Inventory, 4) overlap with MA 8E, 8F and 8G areas, and 5) amenability to community restoration.

Because WI Land Type Association boundaries were the basis for most management area boundaries, at times areas with more disturbed vegetation were included in Management Areas 2B, 3B, and 4B. In order to maintain emphasis on potential for ecosystems at the landscape level, the Forests usually chose to follow LTA boundaries for management areas rather than considering site-level characteristics.

Management direction in areas designated as AMAs contributes to the Forests' ecosystem restoration efforts and emphasizes the maintenance of biodiversity at many levels. Therefore, early-successional forest types are not strongly represented in AMAs. In general, early-successional communities will convert to mid- to late-successional forest types in AMAs. In the development of the Selected Alternative from Alternative 5, over 102,000 acres of Alternative Management Areas (AMAs; MA 2B, 3B, 4B and 4C) were added. This brings the total acreage of AMAs up to 263,300 acres, which is approximately 18% of the Forests' total land base. Under Alternative 5, approximately 11% of the land base was designated as AMA. .

**PC #: 758**

**Public Concern: The Chequamegon-Nicolet National Forests should modify Alternative 5 to allocate additional Management Area 4B.**

**Response:** Additional MA 4B areas were added to Alternative 5 in the development of the Selected Alternative. In particular, approximately 3,100 acres were added on the Park Falls Ranger District (RD), 8,900 acres were added on the Eagle River/Florence RD, and 1,700 acres were added on the Lakewood/Laona RD. These additions raise the total allocation of MA 4B (excluding overlap with MA 8E, 8F, and 8G) to approximately 30,000 acres. Alternative 5 allocated approximately 16,600 acres to MA 4B.

**PC #: 526**

**Public Concern: The Chequamegon-Nicolet National Forests should modify the designations for Jones Spring and Star Lake to Management Area 6B in Alternative 5.**

**Response:** Jones Spring is designated as Management Area 6A (Semi-Primitive Non-Motorized—Low Disturbance (SPNM)) in the Selected Alternative while Star Lake is designated as Management Area 6B (SPNM—Moderate Disturbance). Both of these areas were designated as MA 6A in Alternative 5, the Preferred Alternative in the DEIS. The SPNM management prescriptions (MA 6A and MA 6B) were developed to improve recreation experiences on the Forests for those who enjoy non-motorized forms of recreation such as hiking, biking, cross-country skiing, hunting, and fishing. Thus, these areas were selected not for their timber production potential, but for their ability to provide high quality non-motorized recreation opportunities. Based on internal and

external comments, designating the Jones Spring area as Management Area 6A would most effectively enhance and maintain the exceptional recreational resources for which the area was established. Allowing commercial timber production, even the limited harvest allowed under the Management Area 6B prescription, was not thought to be compatible with the management objectives for the area. Star Lake, however, has fewer ecological benefits and a high proportion of aspen forest type, limiting the quality of non-motorized recreation opportunities in the area. These characteristics made allocation as MA 6B (SPNM, moderate disturbance) a more appropriate designation for the Star Lake area in the 2004 Forest Plan.

**PC #: 725**

**Public Concern: The Chequamegon-Nicolet National Forests should modify Alternative 5 to include additional Management Area 2B, as in Alternatives 4 and 9.**

**Response:** In the development of the Selected Alternative from Alternative 5 of the DEIS, allocations to MA 2B increased from 130,000 acres to 209,000 acres. Alternatives 4 and 9 allocate 234,000 and 282,000 acres to MA 2B, respectively.

**PC #: 543**

**Public Concern: The Chequamegon-Nicolet National Forests should modify the Preferred Alternative to allocate more Ecological Reference Areas.**

**PC #: 552**

**Public Concern: The Final EIS should emphasize old growth and natural features complexes in the Preferred Alternative.**

**Response:** The 2004 Forest Plan will allocate approximately 185,000 acres of ecological reference areas (MA 8E, 8F, and 8G). This is 96% of all the potential ecological reference acres identified in the forestwide inventory of ecologically significant features (see LAD report, Parker 2000). Of this, 85,500 acres are allocated to Old Growth & Natural Feature Complexes (MA 8G). This is 92% of the potential MA 8G acres proposed as a result of field survey and the Landscape Analysis and Design (LAD) process. 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.” This means that the management of National Forests provides for the use of all the various renewable surface resources in a combination that best meets the needs of the American people. The 2004 Forest Plan provides a balance between competing concerns while managing for biological diversity, off road vehicles, timber harvest, and non-motorized recreation. An example of this is the balance between timber production for commercial use and the establishment of management areas like MA 8G that prohibit timber harvest. The 2004 Forest Plan represents an attempt to meet the needs of the diverse public at local, state, and national scales.

**PC #: 550**

**Public Concern: The Final EIS should specify how the Preferred Alternative will meet the requirements of mature forest dependent species.**

**Response:** The requirements of mature forest dependent species will be better met by the Selected Alternative and 2004 Forest Plan than the 1986 Forest Plans for several reasons. First, the 2004 Forest Plan emphasizes large block management including two Northern Hardwood Interior Blocks that exceed 75,000 acres in size (Penokee and Alvin block), and four other blocks ranging in size from 26,700 acres to 48,400 acres. These blocks



consist of contiguous areas designated as Management Areas 2B, 5, 5B, and 6A. Second, other MA 2B, 5, 5B, 6A and 8D areas will increasingly provide habitat for mature forest dependent species as they age. Third, the 2004 Forest Plan emphasizes restoration of features that are characteristic of mature forest such as standing and downed logs and structural and compositional diversity. It is on these features that some of the mature forest specialist species depend. Lastly, Ecological Reference Areas (MA 8E, 8F and 8G) include old growth areas and will provide additional habitat to mature forest dependent species. Under the Selected Alternative, 185,000 acres are designated as MA 8E, 8F, and 8G whereas under Alternative 1 (No Action Alternative), only about 83,000 acres are designated as the equivalent of MA 8E, 8F, and 8G.

**PC #: 92**

**Public Concern: The Chequamegon-Nicolet National Forests should modify Alternative 5 to strengthen protections for pine and oak forests.**

**Response:** Alternative 5 was modified to increase its allocations to Even-aged Hardwood: Oak-Pine (MA 3B) emphasis from 1,700 acres to 10,900 acres under the Selected Alternative. This allocation is only exceeded by Alternatives 3 and 9 and is equal to Alternative 7. Alternative 5 was further modified in the Selected Alternative by increasing the emphasis on Conifer: Pine-Oak (MA 4B) from 17,000 acres to 30,000 acres.

**PC #: 547**

**Public Concern: The Chequamegon-Nicolet National Forests should modify the Preferred Alternative to protect riparian areas.**

**Response:** The respondent(s) are concerned about protecting remote lakes and restoring their native fisheries. Guidance for the restoration of native species is specifically addressed in the “Aquatic Desired Condition” section in Chapter 3 of the 2004 Forest Plan. It directs the Forests to work with the WDNR to restore native communities. The Forests must work cooperatively with the WDNR on any and all species manipulation issues as the WDNR has jurisdiction over the surface waters and fishes in them.

**PC #: 766**

**Public Concern: The Forest Plan should not include the allowable sale quantity constraints outlined in the diversity guidelines.**

**Response:** The response to this public concern is located in the Allowable Sale Quantity section of this Appendix.

**PC #: 765**

**Public Concern: The Chequamegon-Nicolet National Forests should modify Alternative 5 to retain early successional acreages as outlined in Alternative 2 and 6.**

**Response:** Because the Forest Service recognizes the important contributions that early successional forests make to biodiversity at the landscape scale, early successional forest continues to be a strong emphasis in the 2004 Forest Plan. Allocations to early successional vegetation (primarily aspen) management areas (MA 1A, 1B, and 1C) alone amount to approximately 291,000 acres (nearly 20% of the total land base). Additional early successional areas will continue to be created on the Forests through natural processes such as blow-downs and fires. Alternative 5, which was identified as the Preferred Alternative in the DEIS, and the Selected Alternative, which was developed by modifying Alternative 5, were judged to better meet the needs of ecosystem restoration

and landscape pattern because they place a lesser emphasis on early successional forest than Alternative 2.

**PC #: 553**

**Public Concern: The Forest Plan should not prescribe wildlife openings.**

**Response:** Temporary openings are an unavoidable consequence of even aged vegetation management. Permanent openings include remnant or restored barrens, frost pockets, and other natural openings. Some of these openings are maintained through mechanical treatment or prescribed burning. These natural openings comprise the majority of the permanent openings composition component of the various management areas. In general, increases in the number or acreage of permanent openings in an area will be the result of barrens or other openland restoration, not an attempt to increase habitat fragmentation and, consequently, edge species abundance. Also, the 2004 Forest Plan allows for the natural conversion of upland openings to forested conditions where compositional objectives for openings are exceeded.

**PC #: 525**

**Public Concern: The Forest Plan should not rely on fencing as mitigation for browsing.**

**Response:** Although fencing may be used to assure the survival and growth of planted hemlock, it is unlikely to be frequently used to mitigate browsing. There are no guidelines directing the use of fencing as mitigation for browsing.

**PC #: 514**

**Public Concern: The Chequamegon-Nicolet National Forests should ensure the Preferred Alternative adequately separates conflicting uses in the national forests.**

**Response:** Alternative 5 was identified as the agency-preferred alternative in the DEIS because it came closest to maximizing net public benefits in an environmentally sound manner. Comments received on Alternative 5 and other alternatives were taken into account and in some cases contributed to the development of the Selected Alternative. Like the other alternatives considered in the EIS, the Selected Alternative attempts to balance competing demands by providing adequate separation of conflicting uses. This includes confining all motorized vehicles to travelways designated for their specific use and restricting access in certain areas to non-motorized forms of transportation. Non-motorized designations (wilderness, semi-primitive non-motorized, etc.) correspond with management area boundaries and individual areas vary in size from 1100 to 14,000 acres across Alternatives. Because MA 6A, 6B, and 5B boundaries often follow permanent or semi-permanent features such as rivers or roads, one management area may include several different vegetative communities.

**PC #: 556**

**Public Concern: The Chequamegon-Nicolet National Forests should adopt a modified, OHV-friendly version of Alternative 5.**

**Response:** The 2004 Forest Plan and FEIS were developed following extensive internal and external review of the draft Forest Plan and EIS. Comments received on the alternatives considered in the DEIS helped planners gauge public opinion on the issue of OHV access. This information was used in the development of the Selected Alternative to determine the management direction for OHV access that would maximize net public benefits, remain consistent with resource integration and management requirements, and

comply with stated goals and objectives. The anticipated effects of the Selected Alternative on OHV and ATV recreation opportunities are described in detail in the “ATVs and Off Road Vehicles” section of Chapter 3 of the FEIS.

**PC #: 508**

**Public Concern: To protect game species, the Chequamegon-Nicolet National Forests should adopt an alternative other than 5.**

**Response:** The response to this Public Concern is located in the “Game Species” section of this Appendix.

**PC #: 554**

**Public Concern: The Forest Plan should require the road closures listed in Alternative 5 be completed expeditiously.**

**Response:** Road closures are analyzed at the project level. Forestwide and Management Area Standards and Guidelines in the Chequamegon-Nicolet National Forests Land and Resource Management Plan provide direction for Transportation Systems on the Forests.

**PC #: 555**

**Public Concern: The Forest Plan should establish cooperative recreation management areas.**

**Response:** (The respondent suggests that the emphasis placed on motorized recreation in the Preferred Alternative is detrimental to silent sports like hiking, canoeing, and snowshoeing.) As in the past, working cooperatively with recreation user groups remains an important priority for the Forests. These relationships give the Forest Service crucial insight into public opinion on recreation issues, helping to ensure that recreation management decisions adequately reflect the needs of the public. The use of collaborative partnerships to assist the Forest Service in recreation management decision-making is expected to continue unless banned by law, regulation, or order. The 2004 Forest Plan attempts to balance competing demands for use of a limited set of resources by designating certain parts of the Forests for non-motorized recreation and other parts for motorized recreation opportunities. The 2004 Forest Plan borrows from different alternatives (particularly Alternative 5) in order to maximize net public benefits, remain consistent with resource integration and management requirements, and comply with stated goals and objectives. See the “Access and Recreation Opportunities” section of Chapter 3 of the final EIS for more information about the effects of the Selected Alternative on recreation resources.

**PC #: 62**

**Public Concern: To maintain recreation opportunities, the Chequamegon-Nicolet National Forests should not adopt Alternative 5.**

**Response:** The alternatives considered in the EIS provide for the balanced use and management of all Forest resources and needs, including access for recreational pursuits. Alternative 5 was identified as the agency-preferred alternative because it came closest to maximizing net public benefits in an environmentally sound manner. Comments received on Alternative 5 and other alternatives considered in the EIS were taken into account and in some cases contributed to the development of the Selected Alternative. Like the other alternatives considered in the EIS, the Selected Alternative requires that competing demands for use of a limited set of resources be balanced. Balancing competing resource needs or recreational pursuits may require that some uses be restricted. This may involve confining a particular use to certain areas (such as designated trails) or restricting access

in certain areas to non-motorized forms of transportation. Even though parts of the Forests may be closed to certain forms of transportation, they will still be open to the public for the enjoyment of recreational pursuits such as berry picking, hunting, or fishing.

### TO MAINTAIN MOTORIZED RECREATION

**Response:** Public comments received on the alternatives considered in the DEIS were used to gauge public values and attitudes about desired levels of motorized recreation opportunities. This information was used in the development of the Selected Alternative, which is described in detail in Chapters 2 and 3 of the FEIS. The Selected Alternative reflects all aspects of the national resource management agenda, including maintaining adequate opportunities for motorized recreation. However, balancing competing demands for motorized and non-motorized recreation opportunities will require that some uses be restricted in order to prevent user conflicts and unacceptable resource damage. Under the 2004 Forest Plan, all motorized vehicles will be confined to roads open to public use or on trails or routes designated for use by specific motorized vehicles. In addition, achieving the desired average total road density for the Forests will require the decommissioning of approximately 1,060 miles of low standard (mostly Maintenance Level 2) or user-developed roads (see the “Transportation and Open Road Density” section in Chapters 3 and 4 of the final EIS for more information). Indicators 2 and 3 in the “Social and Economic Effects Analysis” (Chapter 3 of the FEIS) discuss the effects of each of the alternatives on area jobs and income.

### TO MAINTAIN HUNTING OPPORTUNITIES

**Response:** Public comments received on the proposed plan and DEIS alternatives were used to gauge public opinion on resource issues, including hunting opportunities. These comments were used in the formulation of the Selected Alternative to ensure that levels of access and resource use reflect public values and attitudes. Concerns about the effects of the alternatives on populations of important game species are addressed in the forest resource sections of this document (i.e. hunting) or in the “Wildlife” section of the FEIS.

### TO MAINTAIN NON-MOTORIZED RECREATION

**Response:** Both motorized and non-motorized forms of recreation are recognized as acceptable and legitimate uses of our National Forests. Thus, eliminating one use or another cannot be considered as a possible solution to the problem. Instead, the 2004 Forest Plan attempts to balance the competing demands of motorized and non-motorized enthusiasts by designating certain parts of the Forests as non-motorized—areas closed to motorized vehicles that will provide forest visitors with quality non-motorized recreation experiences. Because not all forest users have the same vision of what constitutes a “quality non-motorized experience”, the 2004 Forest Plan and EIS provide a range of non-motorized recreation opportunities subject to varying degrees of human disturbance from full vegetation management to no vegetation management. The full range of non-motorized designations is described in the “Wilderness” and “Semi-Primitive Non-Motorized” sections of Chapter 3 of the FEIS. Public comments received on the alternatives considered in the DEIS were used to gauge public values and attitudes about desired levels of non-motorized recreation opportunities. This information was used in the development of the Selected Alternative, which is described in detail in Chapters 2 and 3 of the FEIS. Maintaining and enhancing non-motorized recreation opportunities has been, and will continue to be, a top priority for the Forests.

**PC #: 520**

**Public Concern: The Chequamegon-Nicolet National Forests should modify Alternative 5 to permit hunters access to trails during the summer to train their dogs.**

**Response:** The Selected Alternative restricts ATV use to designated trails and roads year-round except during spring break-up. Most of these open “classified” roads will be on the Chequamegon side of the Forests. The amount of open roads on the Chequamegon side of the Forests should allow opportunities for hunters to train their dogs during most of the year.

**PC #: 537**

**Public Concern: The Chequamegon-Nicolet National Forests should adopt Alternative 5 with an increase in the road density ratio and proposed motorized access areas.**

**Response:** Compared to the other alternatives considered in the EIS, Alternative 5 provides a moderate emphasis on non-motorized experiences. The Selected Alternative, which was developed after extensive internal and external review of the alternatives considered in the DEIS, allocates less non-motorized area and provides more opportunities for motorized access than Alternative 5. All alternatives considered in the EIS call for an average forestwide total road density of 3.0 mi/sq. mi (See Goal 3.1 - Capital Infrastructure, in Chapter 1 of the 2004 Forest Plan). Thorough examination of the issue has determined that increasing the total road density ratio above 3.0 mi/sq mi would be incompatible with the Forests’ long-term management objectives and the desired future condition for the landscape.

**PC #: 557**

**Public Concern: The Final EIS should include a more detailed account of fire management practices in Alternative 5.**

**Response:** The 2004 Forest Plan is designed to be an enabling document that offers broad programmatic direction. The Chequamegon-Nicolet National Forest Fire Management Plan is the comprehensive document specifying fire suppression policies, fire management processes, and the fire organization.

The 2004 Forest Plan allows for the use of prescribed fire as one of many possible management tools. Since prescribed fire is employed to achieve a variety of resource objectives, its applications are described by specific resource or management area, as opposed to being consolidated under the “Fire Management” heading. Under certain management areas (e.g. MA 3B for regenerating oak-pine; MA 4B and 4C for regenerating or restoring natural pine-oak and surrogate pine barrens; MA 8C for managing Riley Lake and Moquah Barrens areas; and certain qualifying areas within MA 8E Research Natural Areas, MA 8F special management areas, and MA 8G old growth) prescribed fire is considered the preferred tool due to ecological restoration goals. The 2004 Forest Plan is permissive, meaning that use of prescribed fire is neither directed nor precluded, but may be considered as a management tool

The decision to use prescribed fire will be determined at the project level, just as would any other management tool (e.g., the type of mechanical scarification to use). The criteria for managing prescribed fires are spelled out in prescribed burn plans for individual projects prepared in accordance with policy set forth in Forest Service Manual 5140. This includes contingency planning, the burn prescription based on acceptable parameters for conditions, and the assignment of resources to conduct a safe burn.

The desired future condition of the fire management program has been in a rapid state of evolution since the advent of the National Fire Plan in 2000. The same is true for the hazardous fuels reduction program on the Forests. The general direction and intent of the fire management program is stated in the 2004 Forest Plan goals, objectives, standards, and guidelines. Should refinement of this direction be needed or should the Forests determine that the standards and guidelines do not offer enough specificity to carry out the intent of the fire management program, they will be reevaluated through a Forest Plan amendment.

## Alternative 6

**PC #: 558**

**Public Concern: The Chequamegon-Nicolet National Forests should adopt Alternative 6.**

**PC #: 66**

**Public Concern: The Chequamegon-Nicolet National Forests should adopt Alternative 6 with an additional increase in non-motorized areas.**

**Response:** Many people expressed an opinion in clear support of, or opposition to, one of the alternatives considered in the EIS. Comments received on Alternative 6 and other alternatives considered in the EIS were taken into account and in some cases contributed to the development of the Selected Alternative. It is important to remember that evaluation of the relative merits of each alternative does not turn upon consideration of a single factor or forest activity, such as allocation of non-motorized areas, but must rather consider the costs and benefits of the alternative as a whole. The Selected Alternative incorporates elements of different alternatives (particularly Alternative 5) that best combine to maximize net public benefits, remain consistent with resource integration and management requirements, and comply with stated goals and objectives.

## Alternative 7

**PC #: 559**

**Public Concern: The Chequamegon-Nicolet National Forests should adopt Alternative 7.**

**Response:** A wide range of alternatives with various levels of outputs and services and varying management area allocation were analyzed in the DEIS. Each of the alternatives in the EIS addresses the plan revision topics and meets the intent of various laws, including multiple use management, under which the national forests are managed. The Selected Alternative in the FEIS was developed by modifying Alternative 5 based on comments received on the Proposed Forest Plan and DEIS. It represents what the Forests' managers consider to be the best balance of outputs and services to achieve sustainable ecosystems, meet the intent of various laws, and address the issues and concerns specific to the management of the Chequamegon-Nicolet National Forests that were identified in the public concerns.



## Alternative 9

**PC #: 763**

**Public Concern: The Chequamegon-Nicolet National Forests should adopt Alternative 9.**

**Response:** A wide range of alternatives with various levels of outputs and services and varying management area allocation were analyzed in the DEIS. Each of the alternatives in the EIS addresses the plan revision topics and meets the intent of various laws, including multiple use management, under which the national forests are managed. The Selected Alternative in the FEIS was developed by modifying Alternative 5 based on comments received on the Proposed Forest Plan and DEIS. It represents what the Forests' managers consider to be the best balance of outputs and services to achieve sustainable ecosystems, meet the intent of various laws, and address the issues and concerns specific to the management of the Chequamegon-Nicolet National Forests that were identified in the public concerns.

**PC #: 67**

**Public Concern: The Final EIS should clarify how Alternative 9 can offer both high ecological restoration and high ATV use.**

**Response:** Addressing the issue of Ecosystem Restoration includes identifying and describing restoration desired conditions for the various management areas, allocating management areas that emphasize restoration, protecting good examples of certain vegetative communities to use as ecological reference areas, and emphasizing management activities that provide desired coarse wood debris and other structural characteristics within the Forests.

Use of All Terrain Vehicles (ATVs) could be compatible with ecosystem restoration if ATVs are restricted to designated trails and roads—as they are in Alternatives 2-9 and the Selected Alternative. Site specific analysis that includes consideration of ecosystem restoration concerns within Plan direction, consideration of desirable recreational experiences, and consideration of public comment will be done before new trail construction occurs.

**PC #: 560**

**Public Concern: The Chequamegon-Nicolet National Forests should modify Alternative 9 to include less timber harvest.**

**Response:** A wide range of alternatives with various levels of outputs and services and varying management area allocation were analyzed in the DEIS. Each of the alternatives in the EIS addresses the major plan revision topics and meets the intent of various laws, including multiple use management, under which the national forests are managed. The Selected Alternative in the FEIS was developed by modifying Alternative 5 based on comments received on the Proposed Forest Plan and DEIS. It represents what the Forests' managers consider to be the best balance of outputs and services to achieve sustainable ecosystems, meet the intent of various laws, and address the issues and concerns specific to the management of the Chequamegon-Nicolet National Forests that were identified in the public concerns.

**PC #: 562**

**Public Concern: The Chequamegon-Nicolet National Forests should modify Alternative 9 to include additional Management Area 2B.**

**Response:** Under the Selected Alternative, 209,000 acres of the Forests are allocated to MA 2B, compared to 130,000 acres in Alternative 5 (Preferred Alternative in the DEIS). Some of the MA 2B areas that were added to Alternative 5 in the development of the Selected Alternative—most notably, 29,000 acres on the Medford district and 39,000 acres on the Park Falls district—were also included in Alternative 9. . Even with these additions, however, MA 2B acreage totals in the Selected Alternative (209,000 acres) were less than those under Alternative 9 (283,000 acres).

## Management Areas

This section of Appendix A is divided into three parts:

- Management area Public Concerns with specific responses
- Combined response to multiple Public Concerns
- Tables of Public Concerns recommending changes to management area allocations and accompanying Responses.

### Management Area Public Concerns with Specific Responses

**PC #: 771**

**Public Concern: The Forest Plan should establish a desired composition range of 35 to 75 percent for aspen in 1B and 1C Management Areas.**

**Response:** Management Areas 1B (Aspen, Mixed Aspen-Conifer, and Conifer) and 1C (Aspen and Hardwood) were developed in part for sites where aspen/conifer mixtures and aspen/hardwood mixtures currently exist, and where land type associations support those species. In particular, aspen and hardwood mixtures exist on portions of the Nicolet. Sites now supporting northern hardwoods are well suited to that species group. Therefore, the vegetative composition objectives for Management Area 1C were developed with less aspen and more northern hardwoods.

Management Area 1B was developed for areas where Land Type Associations support sites with intermixed stands and both aspen and conifer species. Because the sites are well suited to the conifer species, the vegetative composition objectives for MA 1B call for more conifer and less aspen.

As in all management areas, forestwide Standards and Guidelines call for the use of Best Management Practices near water bodies and in riparian areas, the retention of visual qualities along certain travelways, and the encouragement of longer-lived trees species along selected trout streams that usually reduce the composition of aspen species over time. Therefore, recommended composition percentages of 35 to 55% for aspen in MA 1B and 1C are more realistic.

**PC #: 58**

**Public Concern: The Forest Plan should utilize the standards and guidelines of Management Area 2B for other areas of the forest.**

**Response:** The respondent suggests logging during frozen ground conditions to minimize soil compaction, erosion, or impacts on understory communities. Many of these conditions can be mitigated on a site-specific level but are not easily predictable in a

programmatic document. The 2004 Forest Plan is a permissive document in that it limits actions, but all allowed actions do not have to appear in the plan. Therefore, if actions listed for MA 2B are needed in other areas to mitigate effects on soils, understory vegetation, or wildlife, they may be implemented at the site-specific project level.

**PC #: 273**

**Public Concern: The Final EIS should include complete representation of Land Type Associations and their associated community types in an Alternative Management Area designation to ensure long-term species viability.**

**Response:** In general, management area polygons were based on Land Type Association (LTA) boundaries. A wide range of management area allocations are included in the FEIS that address plan revision topics. The Purpose and Need included the need to restore: 1) northern hardwood interior forest structure, composition, and landscape pattern, 2) regionally rare mature natural red/white pine forest communities, 3) globally-imperiled pine barrens, and 4) forest old growth communities. Representation of the first three vegetative communities on suited LTAs was considered during allocation of Management Areas 2B, 3B, 4B, and 4C in Alternatives 2-9 and the Selected Alternative. Representation of these communities was also considered when allocating Management Areas 8E (Research Natural Areas), 8F (Special Management Areas), and 8G (Old Growth and Natural Feature Complexes). Collectively, MA 8E, 8F, and 8G were developed from the Landscape Analysis and Design Process. These three management areas act as ecological reference areas for monitoring and research and as refugia for species.

As a result of management area allocations, Forestwide standards and guidelines, Management Area standards and guidelines, and the aquatic desired future condition, species viability on the Forests is predicted to be maintained or enhanced (See FEIS and Appendix J for more detailed information).

**PC #: 225**

**Public Concern: The Final EIS should include tables that show the distribution of forest types across the spectrum of management areas, and show the overlap of shared land allocations.**

**Response:** Information on overlap of management areas is difficult to clearly display, but has been clarified in the FEIS. Tables 2-18 and 2-19 (Chapter 2, FEIS) compare management area allocation by alternative both with and without overlap. In some cases, several management zones overlap, for example, Vegetative Management Area 2B, overlapped with Recreation Management Area 6B, with inclusions of MA 8E, 8F, or 8G. If standards and guidelines of the different management areas conflict, the most restrictive apply.

Large scale maps (30" x 40") prepared for the 2004 Forest Plan display management area overlap more clearly than the 11" x 17" inch maps in the bound map packet. In addition, acreages of various forest types have been displayed by alternative in the FEIS. Forest type is not displayed by management area and alternative. Vegetation composition by polygon can be found in the planning record.

**PC #: 517**

**Public Concern: The Chequamegon-Nicolet National Forests should ensure that the Preferred Alternative establishes management area boundaries that benefit interior forest habitat and timber production.**

**Response:** The term polygon is used as the base unit of area to which management area allocation is applied. Polygon boundaries were developed based on landscape level information. In particular, Wisconsin Land Type Associations were used as the basis for dividing the National Forests into subunits to which management areas were allocated. Wisconsin Land Type Associations (LTAs) are part of a national hierarchical framework of ecological units featuring Edward A. Hammond's subdivision of landform types and the Bailey-Kuchler ecosystems classification. By using ecological subdivisions, management area allocation focused on landscape pattern and potential of the land. In addition, use of ecological subdivisions helped ensure representation of restored vegetative communities on those LTAs that have the potential to successfully support the communities. By doing so, desired habitats for species of viability concern would be more likely to be maintained or restored. Because LTAs were used as the basis for polygon boundaries and the representation that was desired, polygon boundaries were not changed in response to public comments; in most cases, more emphasis was placed on potential of the land and landscape pattern than on matching management area characteristics to existing vegetation characteristics.

**PC #: 64**

**Public Concern: To support even-aged management of northern hardwood species, the Chequamegon-Nicolet National Forests should adopt an alternative other than 5.**

**Response:** In the 1986 Forest Plans and the 2004 Forest Plan, Management Area 3 emphasizes even-aged management of northern hardwoods. Acres assigned to MA 3 decreased from 1986 Forest Plans levels in Alternatives 2-9 and the Selected Alternative. However, this does not represent a significant reduction in the emphasis on even-aged management of northern hardwoods. Instead, this was largely due to dividing plan revision management areas (MAs) into more specific subcategories. For example, MA 3 was divided into three subcategories—MA 3A, 3B, and 3C—that were assigned to the land in Alternatives 2-9 and the Selected Alternative based on existing species composition and site potential. In addition, MA 1B, a mixture of aspen and conifer species, and MA 2C, aspen/northern hardwood mixture, were assigned to sites in Alternatives 2-9 and the Selected Alternative that had been assigned to MA 3 (even-aged northern hardwoods) in the 1986 Plans. Although management area allocation has changed, even-aged management will still be emphasized on these sites. Land Type Association information that includes soil, geography, and climate provided new insight to planners during the management area allocation process. Site potential was used along with existing vegetation information when assigning management area direction.

Management area allocations vary across alternatives. Total acreage of Management Areas 3B and 3C are similar between Alternative 5 and the Selected Alternative and are highest of all alternatives with the exception of Alternative 1, Existing Condition.

**PC #: 419**

**Public Concern: The Final EIS should compare each alternative, by management area, with the range of natural variation.**

**Response:** Movement toward the Range of Natural Variability was not necessarily part of the Purpose and Need for plan revision. Emphasizing biological diversity on a

landscape scale to provide for the persistence of all native and desired non-native species, however, was part of the purpose of the revision process. The Biological Diversity Planning Topic included an emphasis on changing the vegetative landscape pattern from a collection of small patches of vegetative communities to interior forest conditions in some areas, as well as restoration of selected vegetative communities. Estimates of conditions present before European settlement were used to develop alternatives that varied in their emphasis on moving toward those conditions.

### **Combined Response to Multiple Public Concerns**

The table that follows these paragraphs responds to a group of Public Concerns that recommend making changes in management area allocation compared to the Preferred Alternative as it was described and mapped in the Proposed Plan and DEIS.

The term polygon is used as the base unit of area to which management area allocation is applied. Some Public Concerns included recommendations to redraw the boundaries of base polygons that were used during plan development. In general, polygon boundaries were developed based on landscape level information (occasionally roads were used as boundaries when Recreation Opportunity Spectrum characteristics were used to define an area). In particular, Wisconsin Land Type Associations (LTAs) were used as the basis for dividing the National Forests into subunits that were then assigned specific management area designations that varied by alternative. LTAs are part of a national hierarchical framework of ecological units featuring Edward A. Hammond's subdivision of landform types and the Bailey-Kuchler ecosystems classification. By using ecological subdivisions, management area allocations could better focus on landscape pattern and potential of the land. Use of ecological subdivisions also helped the Forest Service ensure that certain vegetative communities known to occur on the Forests are found on the LTAs that have the potential to successfully support the community. By doing so, desired habitats for species of viability concern would more likely be maintained or restored.

In some cases, respondents indicated that management area boundaries should be redrawn in order to correspond with existing vegetative communities, species, or natural features. However, because of the fact that LTAs were used when drawing polygon boundaries, management area boundaries were not changed.

Some commenters suggested that road density in a specific area be reduced or limited in order to protect certain wildlife species or enhance recreation opportunities. Similar comments are addressed in specific forest resource sections of this document (i.e. Transportation and Biological Diversity) or in the appropriate section of the FEIS. These comments were considered during the review of the Forest Plan between draft and final versions and helped the Forest Service determine the levels of access that best combine to maximize net public benefits, remain consistent with resource integration and management requirements, and comply with stated goals and objectives. Although the Forest Service received many comments requesting a reduction or limitation in road density of a specific area, the recommended change was not always consistent with the long-term management objectives and existing condition of the area.

### **Tables of Public Concerns recommending changes to management area allocations and accompanying Responses**

In Table 1, Column 1 lists Public Concern Statements that recommend changes in MA allocation from the Preferred Alternative. Columns 2 and 3 briefly describe the area recommended for change as described in the Public Concern Statement and associated

sample comments. Polygon numbers are displayed in parentheses as referenced by the commenter or as determined by the Forest Service based on the description given in the Public Concern Statement and sample comments.

The fourth column displays the Preferred Alternative's management area allocation for the polygon or area in question (polygon numbers in parentheses). The fifth column lists the change in allocation recommended by the comments while the sixth column displays any changes in allocation of the area in the 2004 Forest Plan and EIS. Public Concerns referring to areas on the Nicolet land base of the Forests are listed first, followed by those that refer to the Chequamegon.

**Table 1. Public Concerns Recommending Changes to Management Area Allocations  
Nicolet**

<b>PC #</b>	<b>Area Described in PC</b>	<b>District</b>	<b>Management Designation in Preferred Alt.</b>	<b>Respondent's Recommendation for Management Designation</b>	<b>Management Designation in 2004 Forest Plan</b>
18	West-central part of ER-FL district (Nic poly 15 and 23)	Eagle River-Florence	4A	4B	no change from Preferred Alternative
19	SE of Lakewood (Nic poly 90 and 91)	Lakewood	4A	4B	4B
22	Jones Spring (Nic poly 74)	Lakewood	6A	3C + non-motorized	no change
149	Abutting Menominee Indian Reservation (Nic poly 77, 79, 81)	Lakewood	2C (77, 79), 2C (81)	2B	2A (79, 81), no change (77)
303	E and W of Military Rd Scenic Byway (Nic poly 22 and 28)	Eagle River	4A	4B	4B
308	Near Whisker Lk Wilderness (most of Nic poly 10)	Florence	2A	2B-6B	no change
309	Carter Hills and McCaslin Mt. (parts of Nic poly 63, 69, 68, 93)	Lakewood-Laona	1C (63, 69), 2C (68), 3C (93)	2B	no change
315	Expand boundaries of Brule River MA 2B area (Nic poly 8)	Eagle River-Florence	Management Area boundaries are based on LTAs. See text of response for more information.		
326	Area near McComb Lake and Menominee Indian Reservation (part of Nic poly 77, 79, 81)	Lakewood	2C (81), 2C (77, 79)	2B-6B	2A (79, 81), no change (77)
334	Adjacent to N. Branch Oconto River (parts of Nic poly 69, 70, 75, 77, 92)	Lakewood	1C (69), 3C (70), 2C (75, 77), 4A (92)	2B	no change
378	Area between Headwaters and Blackjack Springs Wilderness (Nic poly 22 and 28)	Eagle River	4A	4B	4B
393	E of Headwaters Wilderness (Nic poly 34 and part of 39)	Eagle River	2A (34), 8D (39)	2B	no change
393	N of Headwaters Wilderness (Nic poly 27, and parts of 15, 19, 20, 24, and 26)	Eagle River	2A (26, 27), 4A (15), 2B (19), 2C (24), 8D (20)	2B	no change
394	N of Twin Lk. near Phelps (Nic poly 3)	Eagle River	2A	2B	no change
396	Area S of Twin Lake (SW part of Nic poly 3)	Eagle River	2A	2B	no change



**Nicolet**

<b>PC #</b>	<b>Area Described in PC</b>	<b>District</b>	<b>Management Designation in Preferred Alt.</b>	<b>Respondent's Recommendation for Management Designation</b>	<b>Management Designation in 2004 Forest Plan</b>
397	Between Pine and Popple Rivers (Nic poly 31, 27, 34, 26)	Eagle River-Florence	2A	2B	no change
397	NE Florence District (~Nic poly 10)	Florence	2A	2B	no change
411	S and E of Headwaters Wilderness (Nic poly 34, 44, 85)	Eagle River	2A (34), 2C (44,85)	2B	no change
416	Headwaters region of Popple River (Nic poly 35, 39, 40, 42, 48, and part of 26, 36, 41, 49)	Eagle River-Florence	2C (35, 36, 41), 8D (39), 2A (26, 40, 42, 48, 49)	2B-6B	no change
417	Alvin Cr. headwaters (Nic poly 27 and parts 15, 19, 20, 24, 26)	Eagle River-Florence	4A (15), 2B (19), 8D (20), 2C (24), 2A (26, 27)	2B	no change
428	Area S of Lost Lake (part of Nic poly 30)	Florence	2C	2B	no change
690	Muskrat/Haymeadow Area (Nic poly 33 and E part 28)	Eagle River	4A (28), 2A (33)	2B	4B (28), no change (33)
775	S of Armstrong Creek (Nic poly 54, 55, 56)	Laona	1A (54), 1C (55, 56)	1A	no change
776	N and E of Lakewood (Nic poly 69)	Lakewood	1C	1A	no change
777	NW of Armstrong Creek (Nic poly 37)	Florence	1B	1A	no change
779	E of Hiles (Nic poly 44 and 85)	Eagle River	2C	1C	no change

**Chequamegon**

<b>PC #</b>	<b>Area Described in PC</b>	<b>District</b>	<b>Management Designation in Preferred Alt.</b>	<b>Respondent's Recommendation for Management Designation</b>	<b>Management Designation in 2004 Forest Plan</b>
17	N of Hwy 2 (Cheq poly 7)	Washburn	3C	1B	no change
20	NE Corner of Park Falls unit	Park Falls	4A	4B	4B
21	Unit S of Moquah Barrens (Cheq poly 16)	Washburn	4C	1B	no change
22	Star Lake (Cheq poly 22)	Washburn	6A	1B + non-motorized	1B-6B
59	Spring Brook (Cheq poly 119)	Great Divide	2B	2A	no change
60	Cheq poly 93 and 98	Medford	2A	2B	2B
163	East of Hwy GG (Cheq poly 40 and 42)	Great Divide	2C	2B	no change
301	Foulds Creek block (Cheq poly 76 and E part 114)	Park Falls	2A	2B	2B (76), no change (114)
302	Elk R./Little Willow R. Drumlins (Cheq poly 83 and S part of 84, 85, 118)	Park Falls	2C (83, 118), 1A (84), 2A (85)	2B	2B (83, 85, 118), no change (84)

## Chequamegon

PC #	Area Described in PC	District	Management Designation in Preferred Alt.	Respondent's Recommendation for Management Designation	Management Designation in 2004 Forest Plan
304	Gildden Drumlins (Cheq 49, 111, 115, 120, 59, part of 44, 119, 60)	Great Divide	2A (49, 111, 115), 2B (119), 2C (44), 5B (60, 120), 8D (59)	2B and 8D	2B (60, 115), 8D (120), no change (44, 49, 59, 111, 119)
305	Drummond Ski Area and Lake Owen (Cheq poly 31, E part 29)	Washburn	3C	3B	no change
306	Mondeaux/CTH E (much of Cheq poly 93)	Medford	2A	2B	2B
306	S of Mondeaux/CTH E (part of Cheq poly 102 and 103)	Medford	2C (102), 2A (103)	2B	2B (103), no change (102)
306	SW of Mondeaux/CTH E (part of Cheq poly 96)	Medford	2A	2B	no change
307	Kidrick Swamp (Cheq poly 94, part of 96, 87, 105)	Medford	2A (87, 94, 96), 2C (105)	2B	no change
310	Lost Lake area (Cheq poly 98, part of 96 and W part of 106)	Medford	2A	2B	2B (98), no change (96, 106)
311	Perkinstown area (Cheq poly 107, S and E part of 105, SW 108, small portion 109)	Medford	2A (107, 108), 2C (105), 1C (109)	2B	no change
312	Jump R./Silver Cr./Mondeaux R. Bottoms (part of Cheq poly 89 and 90)	Medford	2C (89), 1A (90)	2B	no change
313	S of Lake Namekagon (Cheq poly 50, 51, and W half of 47)	Great Divide	6A (50), 3C (47, 51)	3B	3B (47, 51), no change (50)
316	Between Penokee Range and Glidden Drumlins (Cheq poly 113 and part of 44)	Great Divide	2C	2A	no change
327	NE of Two Axe Lk (Cheq poly 110 and part of 58 and 65)	Great Divide	2C (65, 110), 1C (58)	2B	no change
328	N of Drummond Woods (E part Cheq poly 25 and part of 22)	Washburn	1A (25), 6A (22)	2B	1B (22), no change (25)
379	N of Hwy 70 in NE part of district (Cheq poly 69)	Park Falls	4A	4B	4B
392	Round Lk/Sixteen Lk (Cheq poly 69, 70, 72, 79, part 78)	Park Falls	4A (69), 6A (70), 1B (72, 79), 1A (78)	4B	4B (69), no change (70, 72, 78, 79)
398	W part of Big Brook SPNM (Cheq poly 32)	Washburn	2A-6B	2B-6B	no change
399	N of Big Brook SPNM (Cheq poly 112)	Washburn	4A	4B	no change
411	Alt. 9 MA 2B areas, Medford RD (Cheq poly 86, 87, 92, 93, 94, 98, 103, 107)	Medford	2A	2B	2B (86, 92, 93, 98, 103), no change (87, 94, 107)
411	N of Flambeau River State Forest (Cheq poly 75)	Great Divide	1C	2B	no change
411	SE part of district near Chippewa River and LAD sites (Cheq poly 60, 61, 66, 111, 115, 119, 120)	Great Divide	2A (61, 66, 111, 115), 2B (119), 5B (60, 120)	2B	2B (60, 61, 66, 115), 8D (120), no change (111, 119)
411	E part of district, S of Hwy 70 (Cheq poly 76, 83, 85, 118)	Park Falls	2A (76, 85), 2C (83, 118)	2B	2B

## Chequamegon

PC #	Area Described in PC	District	Management Designation in Preferred Alt.	Respondent's Recommendation for Management Designation	Management Designation in 2004 Forest Plan
412	E of Rainbow Lk. Wilderness (Cheq poly 25)	Washburn	1A	MA 2	no change
414	N of CTH M near Twin Lakes (Cheq poly 46 and W part 40)	Great Divide	2C (40), 8D (46)	2B	no change
415	NE of Bearsdale Pines to Pigeon Lake (North part of Cheq poly 29)	Washburn	3C	4B	no change
422	general	Park Falls-Great Divide	1A	1B	no change
778	N of Ino (part of Cheq poly 13 and 16)	Washburn	4A (13), 4C (16)	1B	no change

Table 2 responds to several Public Concerns that recommend increasing or decreasing acreage allocated to specific management areas. The Public Concern Statement number is listed in the first column, followed by the respondent's recommendation in the second column, management area allocations under the Preferred Alternative in the third column, and management area allocations in the 2004 Forest Plan in the fourth column.

A wide range of management area allocations were included in the alternatives described in the FEIS, each of which addresses the plan revision topics of access and recreation opportunities, biological diversity, special land allocations, and timber production. Each of the alternatives meets the intent of various laws, including multiple use management, under which the National Forests are managed. In the opinion of the Forests' managers, the 2004 Forest Plan and FEIS provide the balance of outputs and services needed to help achieve sustainable ecosystems, meet the intent of applicable laws, and address the specific management concerns for the Chequamegon–Nicolet National Forests that were identified in public comments. Maps that display management area allocation for the Selected Alternative and other alternatives are included in the Map Packet.

**Table 2. Response to Public Concerns Regarding General Management Area Allocations**

PC #	Respondent's Recommendation	Acreage, Preferred Alternative	Acreage, 2004 Forest Plan
187	Decrease MA 1A, 1B, 1C	MA 1A - 157,935 MA 1B - 32,865 MA 1C - 95,092	MA 1A - 157,938 MA 1B - 37,999 MA 1C - 95,093
505	Increase MA 1	Total, MA 1A, 1B, 1C: 285,892	Total, MA 1A, 1B, 1C: 291,030
774	Increase MA 1A	157,935	157,938
57 402 405	Increase MA 2B	129,839	209,090
505	Decrease MA 2	Total, MA 2A, 2B, 2C: 648,296	Total 2A, 2B, 2C: 645,726
405	Increase MA 3B	1,687	10,899

PC #	Respondent's Recommendation	Acreage, Preferred Alternative	Acreage, 2004 Forest Plan
24 405 682	Increase MA 4B	16,631	30,422
426	Redraw management area boundaries to avoid mixing different vegetative communities	Management Area boundaries are based on LTAs. See text of response for more information.	
782	Designate white cedar swamps as MA 1B or 1C, not MA 1A	In all alternatives, coniferous swamps were avoided when possible when allocating MA 1A areas. MA 1B areas emphasize conifer and mixed conifer stands.	

### Public Concerns (Table 1 - Nicolet)

PC #: 18

Public Concern: The Forest Plan should designate the unit labeled Management Area 4A, on the west-central portion of the Eagle River-Florence District, as Management Area 4B.

PC #: 19

Public Concern: The Forest Plan should expand the unit labeled Management Area 4B, in the southeast portion of the Lakewood-Laona District; to include some of the adjacent area designated Management Area 4A.

PC #: 22

Public Concern: The Forest Plan should designate the unit labeled Management Area 6A, in the east-central portion of the Washburn District, as Management Area 1B.

PC #: 149

Public Concern: The Forest Plan should include more Management Area 2B, especially in the Medford District where the forest abuts the Menominee Indian Reservation.

PC #: 303

Public Concern: The Forest Plan should designate the areas east and west of the Military Road Scenic Byway as Management Area 4B.

PC #: 308

Public Concern: The Forest Plan should designate the area immediately east of the Whisker Lake Wilderness Area as Management Area 6B-2B.

PC #: 309

Public Concern: The Forest Plan should designate the Carter Hills and McCaslin Mountain area as Management Area 2B.

PC #: 315

Public Concern: The Forest Plan should expand the boundaries of Management Area 2B just south of the upper reaches of Brule River.

PC #: 326

Public Concern: The Forest Plan should designate the area near McComb Lake

on the border of the Menominee Indian Reservation as Management Area 6B-2B.

PC #: 334

Public Concern: The Forest Plan should designate the area next to the North Branch of the Oconto River as Management Area 2B.

PC #: 378

Public Concern: The Forest Plan should designate the area between the Headwaters and Blackjack Springs Wilderness Areas as Management Area 4B.

PC #: 393

Public Concern: The Forest Plan should designate the area east of the Headwater Wilderness as Management Area 2B.

PC #: 394

Public Concern: The Forest Plan should designate the area north of Twin Lake near the town of Phelps as Management Area 2B.

PC #: 396

Public Concern: The Forest Plan should designate the area south of Twin Lake as Management Area 2B.

PC #: 397

Public Concern: The Chequamegon-Nicolet National Forests should extend the boundaries of the AMA north of Hwy 70 on the Eagle River/Florence District south from the Brule River 2B polygon into the current 2A areas near the Pine and Popple Rivers.

PC #: 411

Public Concern: The Forest Plan should designate 2B Management Areas as described in Alternative 9.

PC #: 416

Public Concern: The Forest Plan should designate areas in the headwaters region of the Popple River as Management Area 6B-2B.

PC #: 417

Public Concern: The Forest Plan should designate the Alvin Creek Headwaters Area as Management Area 2B.

PC #: 428

Public Concern: The Forest Plan should designate the area immediately to the south of the Lost Lake Area as Management Area 2B.

PC #: 690

Public Concern: The Forest Plan should designate the Muskrat/Hay Meadow area as Management Area 2B.

PC #: 775

Public Concern: The Forest Plan should designate the area south of Armstrong Creek as Management Area 1A.

PC #: 776

Public Concern: The Forest Plan should designate the area northeast of Lakewood as Management Area 1A.

PC #: 777

Public Concern: The Forest Plan should designate the northwest of Armstrong Creek as Management Area 1A.

PC #: 779

Public Concern: The Forest Plan should designate the 2C Management Area east of Hiles as Management Area 1C.

### Public Concerns (Table 1 – Chequamegon)

PC #: 17

Public Concern: The Forest Plan should designate the unit labeled Management Area 3C, on the Washburn District north of Highway 2, as MA 1B.

PC #: 21

Public Concern: The Forest Plan should designate the unit labeled Management Area 4C, south of the Moquah Barrens, as Management Area 1B.

PC #: 22

Public Concern: The Forest Plan should designate the unit labeled Management Area 6A, in the east-central portion of the Washburn District, as Management Area 1B.

PC #: 59

Public Concern: The Forest Plan should designate as Management Area 2A the unit labeled Management Area 2B, in the southeast corner of the Great Divide District.

PC #: 60

Public Concern: The Forest Plan should include two Management Area 2B designations in the Medford unit.

PC #: 163

Public Concern: The Final EIS should include an alternative with large blocks of Management Area 2B to maintain interior forest species.

PC #: 301

Public Concern: The Forest Plan should designate the Foulds Creek Block as Management Area 2B.

PC #: 302

Public Concern: The Forest Plan should designate the Elk River/Little Willow River Drumlins as Management Area 2B.

PC #: 304

Public Concern: The Forest Plan should designate the Glidden Drumlins area as Management Area 2B with 8D along the river corridor.

PC #: 305

Public Concern: The Forest Plan should designate the Drummond Ski Trail area, and Lake Owen as Management Area 3B.



**PC #: 306**

**Public Concern:** The Forest Plan should designate the Mondeaux/County E Hardwoods area, and the two mature forest habitat linkages which would connect this site with the potential Kidrick and Lost Lake Alternative Management Areas, as Management Area 2B.

**PC #: 307**

**Public Concern:** The Forest Plan should designate the Kidrick Swamp area as Management Area 2B.

**PC #: 310**

**Public Concern:** The Forest Plan should designate the Lost Lake Area as Management Area 2B.

**PC #: 311**

**Public Concern:** The Forest Plan should designate the Perkinstown Area as Management Area 2B.

**PC #: 312**

**Public Concern:** The Forest Plan should designate the Jump River/Silver Creek/Mondeaux River Bottoms area as Management Area 2B.

**PC #: 313**

**Public Concern:** The Forest Plan should designate the area south of Lake Namekagon as Management Area 3B.

**PC #: 316**

**Public Concern:** The Forest Plan should establish a Management Area 2A landscape connection between the proposed Penoque Range and the Glidden Drumlins Alternative Management Areas.

**PC #: 327**

**Public Concern:** The Forest Plan should designate the area northeast of Two Axe Lake as Management Area 2B.

**PC #: 328**

**Public Concern:** The Forest Plan should designate the area north of the Drummond Woods Area as Management Area 2B.

**PC #: 379**

**Public Concern:** The Forest Plan should designate the area north of Highway 70 on the Park Falls District as Management Area 4B.

**PC #: 392**

**Public Concern:** The Forest Plan should designate the Round Lake/Sixteen Lakes area as Management Area 4B.

**PC #: 398**

**Public Concern:** The Forest Plan should designate the western half of the Big Brook semi-primitive non-motorized area as Management Area 6B-2B.

**PC #: 399**

**Public Concern:** The Forest Plan should designate the areas to the north and east of the Big Brook semi-primitive non-motorized area as Management Area 4B.

PC #: 411

Public Concern: The Forest Plan should designate 2B Management Areas as described in Alternative 9.

PC #: 412

Public Concern: The Forest Plan should designate the area in the southeastern part of the Washburn District east of the Rainbow Wilderness Area as Management Area 2.

PC #: 414

Public Concern: The Forest Plan should designate the area north of Highway M, near Twin Lakes, as Management Area 2B.

PC #: 415

Public Concern: The Forest Plan should create a mature forest linkage from the area northeast of Bearsdale Pines region to Pigeon Lake by designating this area Management Area 4B.

PC #: 422

Public Concern: The Forest Plan should designate the portions of Management Area 1A on the Park Falls and Great Divide Ranger Districts as Management Area 1B.

PC #: 778

Public Concern: The Forest Plan should designate the Management 4 areas north of Ino as Management Area 1B.

### Public Concerns (Table 2)

PC #: 24 Public Concern: The Forest Plan should include more pine restoration areas.

PC #: 57

Public Concern: The Forest Plan should include more 2B Management Areas.

PC #: 187

Public Concern: The Forest Plan should reduce the total acres allocated to Management Areas 1A, 1B, and 1C.

PC #: 402

Public Concern: The Forest Plan should provide better settings for hemlock regeneration by expanding 2B Management Areas.

PC #: 405

Public Concern: The Forest Plan should preserve interior forest conditions by expanding Management Areas 2B, 3B, and 4B.

PC #: 426

Public Concern: The Forest Plan should draw management areas to avoid mixing fragmented aspen/plantation areas with closed canopy interior forest conditions.

PC #: 505

Public Concern: The Chequamegon-Nicolet National Forests should adopt

**Alternative 4, modified to increase Management Area 1, decrease Management Area 2, and prohibit new off-highway recreation trails.**

**PC #: 682**

**Public Concern: The Forest Plan should restore large patches of uneven-aged red and white pine in MA 4B and restore interior northern hardwoods in MA 2B to "desired conditions."**

**PC #: 774**

**Public Concern: The Forest Plan should increase the allocation of Management Area 1A on the east side of the Forest.**

**PC #: 782**

**Public Concern: The Forest Plan should change Management Area 1A designations in white cedar swamps to Management Areas 1B and 1C.**

### **Tribal Rights and Interests**

**PC #: 511**

**Public Concern: The Chequamegon-Nicolet National Forests should consult local tribes when identifying cultural properties.**

**Response:** Local tribes are consulted during site-specific project level analysis for the identification of tribal sites of cultural significance.

**PC #: 662**

**Public Concern: The Chequamegon-Nicolet National Forests should protect species of importance to the Ojibway people.**

**Response:** The Selected Alternative is expected to have a beneficial impact on American marten populations because habitat conditions are expected to remain stable or improve during implementation of the 2004 Forest Plan. Continuous blocks of northern hardwoods will be maintained and Forestwide guidelines will ensure the retention of woody debris and large cavity trees for the American marten and other wildlife species. Based on the latest scientific information, there are no Canada lynx breeding populations in Wisconsin. Lynx are occasionally sighted in northern Wisconsin but these individuals are believed to be visitors from northern Michigan or Minnesota. Nonetheless, the increased emphasis on roadless areas, semi-primitive non-motorized areas, and other non-motorized areas in the Selected Alternative when compared to the existing condition would probably increase favorable habitat.

### **General Environmental Values**

**PC #: 606**

**Public Concern: The Forest Plan should preserve the Chequamegon-Nicolet National Forests.**

**Response:** The USDA Forest Service is required by law to manage the National Forests for multiple use. The Multiple-Use Sustained Yield Act of 1960 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." This means that the National Forests like the Chequamegon-Nicolet will be managed to provide uses of renewable surface resources in a combination that best meets the needs of the American people. The 2004 Forest Plan provides a balance between competing

concerns while managing for biological diversity, off road vehicles, timber harvest, and non-motorized recreation.

**PC #: 246**

**Public Concern: The Forest Plan should establish undisturbed areas where natural cycles can take place and where endangered wildlife will survive.**

**Response:** When compared to the existing condition (Alternative 1), the 2004 Forest Plan increases the emphasis on areas where little or no vegetation management is allowed (Management Areas 5B, 6A, 8D, 8E, 8F and 8G). Natural ecological processes rather than human-caused habitat alterations dominate the disturbance regime in these areas.

**PC #: 249**

**Public Concern: The Chequamegon-Nicolet National Forests should not sacrifice natural resources in the long term for short-term economic gain.**

**Response:** The USDA Forest Service is required by law to manage the National Forests for multiple use. The Multiple-Use Sustained Yield Act of 1960 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.” This means that National Forests like the Chequamegon-Nicolet are managed to provide for use of all the renewable surface resources in a combination that best meets the needs of the American people. Managing in this manner often does not provide short term economic gain. The 2004 Forest Plan provides a balance between competing concerns while managing for biological diversity, off road vehicles, timber harvest, and non-motorized recreation.

## Environmental Quality

**PC #: 244**

**Public Concern: The Chequamegon-Nicolet National Forests should consider the environmental benefits of using wood as a structural material.**

**Response:** This concern is not related to guidance or direction provided in the 2004 Forest Plan.

**PC #: 255**

**Public Concern: The Chequamegon-Nicolet National Forests should consult with the Wisconsin Department of Natural Resources regarding the use of lime to mitigate acid deposition effects and to improve productivity.**

**Response:** The Forests have a long-standing history of cooperating with the Wisconsin Department of Natural Resource (WDNR) on fisheries issues. In fact, for 25 years the Forests have supported and financed the Forest Service/WDNR fisheries contract. Because of this effort all fish habitat improvement and restoration activities on the Forests are closely coordinated with WDNR personnel. The decision to lime a lake would be made at the site-specific project level and public input will be solicited in the decision-making process.

## Physical Environment

### Soils

**PC #: 610**

**Public Concern:** The Chequamegon-Nicolet National Forests should protect and restore soils through management practices, inventories, and monitoring results.

**PC #: 123**

**Public Concern:** The Forest Plan should reduce erosion by limiting mechanized forest uses.

**PC #: 251**

**Public Concern:** The Forest Plan should protect soils from the erosion caused by clear-cutting.

**Response:** Forestwide Standards and Guidelines in Chapter 2 of the 2004 Forest Plan provide direction for soil disturbing activities as a result of timber harvest or motorized vehicle use. They would be applied on a site-specific basis during project level analysis.

### Air Pollution

**PC #: 252**

**Public Concern:** The Forest Plan should restrict OHV use to help reduce greenhouse gasses and air-pollution.

**Response:** Air quality within the Chequamegon-Nicolet National Forests is generally good. All areas in the Forests attain the Clean Air Act Standards for the six criteria pollutants identified by the Environmental Protection Agency. The pollutants identified are particulate matter, sulfur dioxide, carbon monoxide, ozone, nitrogen oxides and lead. Please see Chapter 3 of the FEIS for detailed discussion of air quality on the Forests.

In addition, Forestwide Standards and Guidelines in the 2004 Forest Plan require the Chequamegon-Nicolet National Forests to conduct management activities in a manner that does not negatively impact air quality standards.

### Noise Pollution

**PC #: 253**

**Public Concern:** The Chequamegon-Nicolet National Forests should control noise-pollution sources.

**Response:** The Chequamegon-Nicolet National Forests recognize the negative and undesirable impacts of noise on the Forests for those who prefer a more quiet experience. Some management areas established on the Forests do not allow motorized vehicle use, while others do. The end result is that the noise from roads and motorized vehicles is concentrated in certain areas, leaving other parts of the Forests for more quiet experiences. Many campgrounds on the Forests impose time restrictions on the use of generators and ATVs, and some areas do not allow any type of motorized use. Standards and guidelines are also in place to limit disturbing activities, such as motorized use, for the protection of Threatened and Endangered Species.

## Aquatic Resources

**PC #: 650**

**Public Concern: The Forest Plan should protect areas with rich aquatic values.**

**Response:** The alternatives analyzed in the DEIS provide a range of areas that would receive special protection or management as Research Natural Areas (MA 8E), Special Management Areas (MA 8F) and Old Growth-Natural Feature Complexes (MA 8G). These areas contain a broad range of aquatic types including streams, lakes, and wetlands. Acreage of these areas increases in the Selected Alternative (2004 Forest Plan) over the 1986 Plans. The 2004 Forest Plan also includes an increase in lake acreage with non-motorized access and a forestwide objective to increase public ownership on lakes and rivers (Chapter 1, 2004 Forest Plan). In addition, little or no development would occur along National Forest shoreline.

**PC #: 646**

**Public Concern: The Forest Plan should include standards, guidelines, and objectives that protect and restore aquatic resources.**

**Response:** The 2004 Forest Plan addresses Aquatic Resources through a variety of avenues. The “Aquatic Desired Condition” provides direction for watersheds, riparian areas, and aquatic resources across the Forests (Chapter 3, 2004 Forest Plan). Tied to the Aquatic Desired Condition are the forestwide Standards, Guidelines, Goals, and Objectives that address road/trail stream crossings, riparian management (Best Management Practices), fisheries habitat improvement, and other issues related to aquatics.

Currently, there are no designated Total Maximum Daily Load waters on the Forests other than those lakes that have mercury advisories.

**PC #: 649**

**Public Concern: The Forest Plan should include benchmarks that quantify the values of aquatic systems.**

**Response:** The Forests classify aquatic systems and wetlands using a variety of factors to better understand their health and variability. The Forests are developing an ecological classification system for streams based on width, alkalinity, water temperature, fish, and mussels. This work is nearly complete and will help improve management of streams on the Forests, identify where stream health may be affected, and aid understanding of the natural variability in streams. Wetlands are classified using vegetation, soils, and water source. Lakes are classified using readily available data regarding size, depth, chemistry, and fish. This information helps to better understand the natural variability and condition of these resources. The 2004 Forest Plan provides a desired future condition for watersheds, riparian ecosystems, aquatic ecosystems and aquatic communities (Chapter 3, 2004 Forest Plan) which generally provides for maintaining or improving the health of these resources. Standards and Guidelines (Chapter 2, 2004 Forest Plan) along with existing laws and regulations provide protection for these resources. In addition, monitoring will be conducted during implementation of the plan (Chapter 4, 2004 Forest Plan).



**PC #: 254**

**Public Concern: The Forest Plan should clarify that the Wisconsin Department of Natural Resources is responsible for permitting any activity that will affect the quality of Wisconsin waters.**

**Response:** The Forests recognize that the Wisconsin Department of Natural Resources (WDNR) has been delegated authority to manage water quality under the Clean Water Act and will continue to obtain appropriate permits with regard to water quality. Because the WDNR's authority is recognized by existing law, the standard referred to in the Public Concern has been removed from the 2004 Forest Plan. The Forests will continue to work closely with the WDNR to achieve water management goals.

**PC #: 12**

**Public Concern: The Forest Plan should protect aquatic resources by restricting logging.**

**Response:** Forestwide Standards and Guidelines in the 2004 Forest Plan protect aquatic resources from the potential impacts of timber harvest. Standards and Guidelines are also in place to prevent impacts to soils that could run off into waterways as a result of management activities. Relevant Standards and Guidelines are detailed in Chapter 2 of the 2004 Forest Plan.

## **Riparian Areas**

**PC #: 647**

**Public Concern: The Forest Plan should include wider buffers and corridors surrounding valuable aquatic resources.**

**Response:** Buffers and corridors are used in the 2004 Forest Plan for a variety of purposes including protection of water quality and aquatic habitat, protection, or enhancement of habitat for a number of wildlife species, and to enhance recreation or aesthetics. To the extent practicable, these purposes have been integrated into forestwide Standards and Guidelines and management area direction (Chapters 2 and 3 of the 2004 Forest Plan, respectively).

Several rivers on the Forests are designated or are eligible to be designated as wild, scenic or recreational rivers. They have special management direction (Management Area 8D, Chapter 3, 2004 Forest Plan) which includes a ¼ mile corridor on each side where management activities are modified to protect recreation and aquatic values. A standard for MA 8D requires that even-aged management practices will not be visible from the river and will not be permitted within 200 feet of the river shoreline. These river corridors traverse much of the Forests and provide major travel corridors for many wildlife species.

The 2004 Forest Plan guideline regarding buffers around streams requires use of riparian management zones in Wisconsin's Forestry Best Management Practices for Water Quality. The zone or buffer around perennial lakes and streams is 100 feet. Within this zone, selective timber harvest is allowed but at least 60 square feet of basal area must be maintained throughout the buffer with management that features long-lived species. In addition, there is a 2004 Forest Plan standard that does not allow aspen to be reforested within 450 feet of selected trout streams or 300 feet of all other Class I or II trout streams and their tributaries. Timber harvest can and will occur within these zones but management will emphasize species other than aspen to reduce the impacts of beaver on trout habitat over time. While these standards and guidelines were developed primarily to protect water quality and aquatic resources, the zones they create provide travel corridors

that are considered adequate for a variety of wildlife. Many of these travel corridors also connect to the larger river corridors. Guidelines for Management Area 2 provide direction to maintain conifer and older age classes within 300 feet of rivers (greater than 50 feet wide at bankfull) that will provide additional travel corridors for wildlife.

The forestwide guidelines for woodland ponds have been modified to improve their clarity (Chapter 2, 2004 Forest Plan). These guidelines were developed using a variety of information including Wisconsin's Forestry Best Management Practices for Water Quality, existing scientific information, local monitoring, and professional judgment. Other factors considered in their development is that woodland pond size and abundance varies across the landscape, that woodland ponds have historically experienced a range of hydrologic and vegetative disturbances, and that species which use these ponds have adapted to these conditions. Therefore, the guidelines allow for a range of vegetative disturbances adjacent to woodland ponds depending on their size, abundance, and permanence of water.

**PC #: 126**

**Public Concern: The Chequamegon-Nicolet National Forests should reduce the size of riparian buffer zones.**

**Response:** The 2004 Forest Plan guideline regarding buffers around creeks requires use of Wisconsin's Forestry Best Management Practices for riparian management zones. The zone or buffer around perennial lakes and streams is 100 feet. Within this zone, timber harvest is allowed but no heavy equipment can operate within 50 feet of the water body and at least 60 square feet of basal area must be maintained throughout the buffer. Thus, while timber harvesting is restricted to protect water quality, some selective timber harvest can occur. The 2004 Forest Plan standard does not allow aspen to be reforested within 450 feet of selected trout streams or 300 feet of all other Class I or II trout streams and their tributaries. Timber harvest can and will occur within these zones but management will emphasize species other than aspen to reduce the impacts of beaver on trout habitat over time.

**PC #: 256**

**Public Concern: The Forest Plan should include a forestwide standard of managing for long-lived conifers along all cold water streams to protect cold water streams from flooding and conversion to warm water streams by beavers.**

**Response:** There are several forestwide standards and guidelines in the 2004 Forest Plan that address management of long-lived conifers along trout streams and other waterbodies. Specifically, there is a guideline under "Aspen and Beaver Management" that provides direction for the conversion of aspen to long-lived conifers and northern hardwoods along certain trout streams (Chapter 2, 2004 Forest Plan). In addition, the "Aquatic Desired Condition" in Chapter 3 of the 2004 Forest Plan provides direction for desired species in riparian areas.

**PC #: 773**

**Public Concern: The Forest Plan should provide for aspen regeneration along streams and spring ponds.**

**Response:** The desired future condition for riparian forests includes tall, large-diameter, long-lived trees that provide shade, bank stability, and large woody debris. Vegetation management emphasizing aspen will not lead to the desired future condition in riparian areas.

Aspen is a desired species in riparian areas only when the maintenance or enhancement of beaver habitat is desired. Generally, these areas are not near trout streams or spring ponds. Nevertheless, beaver are a desirable species in the landscape and the Forests will continue to cooperate with the Wisconsin Department of Natural Resources to establish a population and distribution of beaver across the Forests (Objective 1.5b).

**PC #: 124**

**Public Concern: The Forest Plan should protect riparian areas.**

**Response:** The 2004 Forest Plan provides for the protection, careful management, and restoration of riparian areas in a number of ways. Goal 1.3 – Aquatic Ecosystems calls for providing healthy riparian areas and includes several objectives to help accomplish this goal. Forestwide standards and guidelines provide specific actions to protect riparian areas including the use of Wisconsin’s Forestry Best Management Practices (BMPs) for riparian management zones. The zone or buffer around perennial lakes and streams is 100 feet. Within this zone, timber harvest is allowed but no heavy equipment can operate within 50 feet of the water body and at least 60 square feet of basal area must be maintained throughout the buffer. This zone is generally considered adequate to protect water quality on the Forests because of the gentle relief, rapid re-growth of vegetation, dense ground cover, and, in some cases, logging only during frozen ground conditions. The Wisconsin Department of Natural Resources’ *The 1995-1997 BMP Monitoring Report* (1999) verifies the effectiveness of the riparian management zones. In addition, the zone can be increased during site specific analyses if necessary. The “Aquatic Desired Condition” (Chapter 3, 2004 Forest Plan) provides long term direction for management of watersheds, riparian ecosystems, aquatic ecosystems and aquatic communities.

**PC #: 612**

**Public Concern: The Chequamegon-Nicolet National Forests should ensure the health of rivers, both inside and outside national forest boundaries.**

**Response:** The Chequamegon-Nicolet National Forests decided no further suitability determinations for Wild and Scenic Rivers would be made in the plan revision process. However, management direction for Existing, Eligible and Potentially Eligible Wild, Scenic and Recreational Rivers (MA 8D) will protect and enhance the values for which the river corridors were identified. Management area direction also provides for the protection and management of state wild rivers in accordance with a memorandum of understanding between the Forest Service and Wisconsin Department of Natural Resources. Additional guidance can be found in Chapter 3 of the 2004 Forest Plan.

**PC #: 652**

**Public Concern: The Chequamegon-Nicolet National Forests should protect species and processes dependent on natural stream flows by setting adequate minimum in-stream flows.**

**Response:** Water withdrawals are rare on the Forests and were not identified as a major issue during forest plan revision. The standard referenced above is intended to provide a minimum level of flow maintenance and is consistent with Wisconsin requirements for maintaining flow below dams (Wis Stats. 31.34) The standard is intended to be used for short periods of time (e.g., hours or a few days) for such activities as culvert replacements and impoundment refilling. Since the 2004 Forest Plan will be used for the next 10-15 years, the standard allows for the use of the most recent and up-to-date methods.

If the size of the river or duration of water withdrawal warrants a detailed site-specific environmental analysis, In-stream Flow Incremental Methodology or other commonly accepted methods would probably be used and public comments would be solicited.

The Forests have participated in state-wide monitoring of forestry BMPs and have been found to be effective in protecting water quality (WDNR 1999).

## Water Quality

**PC #: 224**

**Public Concern: The Chequamegon-Nicolet National Forests should help reduce pollution in Lake Michigan by not selling timber to paper mills.**

**Response:** Companies and individuals who buy timber from the Chequamegon-Nicolet National Forests do so on a “highest bidder” basis, which means the Forests have, in most cases, no control over who purchases forest products. Federal law also prohibits the Forests from discriminating against prospective purchasers of National Forest timber.

**PC #: 258**

**Public Concern: The Forest Plan should require water quality monitoring.**

**Response:** The Wisconsin Department of Natural Resources is the agency responsible for waterways in the state and, therefore, water quality monitoring. The 2004 Forest Plan utilizes direction found in the Wisconsin’s Forestry Best Management Practices for Water Quality as it relates to the protection of watersheds, riparian areas, and wetlands.

## Wetlands

**PC #: 271**

**Public Concern: The Chequamegon-Nicolet National Forests should evaluate forested wetlands for management on a site-by-site basis.**

**PC #: 259**

**Public Concern: The Forest Plan should exclude wetlands from the suitable timber base.**

**PC #: 616**

**Public Concern: The Forest Plan should preserve and protect bogs.**

**Response:** The Chequamegon-Nicolet National Forests contain approximately 347,000 wetland acres, in addition to many small (less than one acre), isolated wetlands referred to as woodland ponds or vernal pools. Forest Service policy regarding wetlands is based primarily on legal requirements in the Clean Water Act and Executive Order 11990 for the Protection of Wetlands. This policy includes, but is not limited to, minimizing adverse impacts to wetlands, preserving and restoring the beneficial uses of wetlands, avoiding wetlands whenever there is a practicable alternative, and providing for early public review for all actions affecting wetlands.

**PC #: 270**

**Public Concern: The Chequamegon-Nicolet National Forests should use the North Central Research Station to develop and monitor regeneration strategies for forested wetlands.**

**Response:** The Forests are likely to work with both the North Central Research Station and the Wisconsin Department of Natural Resources when carrying out experimental

treatments in forested wetlands. Pooling resources helps resolve wetland forest type regeneration issues.

**PC #: 269**

**Public Concern: The Chequamegon-Nicolet National Forests should selectively use timber harvest to regenerate forested wetlands.**

**Response:** The response to this Public Concern can be found in the “Timber Resource Management” section of this Appendix.

**PC #: 653**

**Public Concern: The Forest Plan should protect wetlands from the effects of road construction and timber harvest.**

**Response:** Several standards and guidelines regarding water quality and wetlands have been removed from the 2004 Forest Plan because they are a duplication of existing laws or regulations. The Clean Water Act requires the USDA Forest Service to control non-point sources of water pollution through the use of best management practices (Section 319) and to minimize the placement of fill material in wetlands, although normal silvicultural activities are acceptable (Section 404). Executive Order 11990 requires federal agencies to avoid, to the extent possible, both long and short term adverse impacts to wetlands whenever there is a practicable alternative.

Objectives for aquatic ecosystems call for reducing the number of road and trail stream crossings and reducing or eliminating off-trail/road vehicle use in wetlands and riparian areas (Chapter 1, 2004 Forest Plan). Standards and guidelines call for avoiding stream and wetland crossings when constructing new roads and trails, relocating existing roads and trails out of wetlands when practicable or reconstructing existing road and trail crossing to minimize erosion, sedimentation and other impacts (Chapter 2, 2004 Forest Plan).

## **Climate Change**

**PC #: 260**

**Public Concern: The Final EIS should include a full exploration of the effects of climate change on wildlife and trees.**

**Response:** The FEIS considered the effects of climate change on Northern Forests (Chapter 3, FEIS). It was not thoroughly addressed during the plan revision because there is so much uncertainty in the measures that any estimates of effects would be unreliable at this time.

There are numerous provisions in forest planning direction and regulations to allow plan revision and amendment in response to changes in conditions and to address new information. The science on global warming is not yet at a stage to provide direction and answers to forest planning questions.

## Biological Resources

### Biological Diversity

**PC #: 13**

**Public Concern: The Forest Plan should preserve and enhance the diversity of plant and animal communities.**

**Response:** Biological Diversity was recognized as one of the four major topics in the revision process. Five issues within that topic were addressed in the formulation of the 2004 Forest Plan (see FEIS Chapter 1). Development of management area standards and guidelines and management area designations (size, shape, location, juxtapositions with other MAs) were guided, in part, by the need to better preserve or restore biological communities. Among the improvements from the 1986 Plans are an increased emphasis on watershed management, reductions in habitat fragmentation through an increased emphasis on large block management, increased attention to landscape-level habitat connectivity, and greatly refined standards and guidelines that reflect our more thorough understanding of the habitat requirements of the species found on the Forests.

**PC #: 607**

**Public Concern: The Forest Plan should require maintenance of viable populations of native and desired non-native species across the planning area.**

**Response:** The response to this Public Concern is located in the “Threatened, Endangered, and Sensitive Species” section of this Appendix.

**PC #: 265**

**Public Concern: The Forest Plan should maintain biological diversity by implementing standards and guidelines that manage the composition of forested landscapes and individual forest stands.**

**Response:** The 2004 Forest Plan and the Selected Alternative emphasize the maintenance of biological diversity at many levels. Management area designations reflect not only the biotic potential of the area but also its role in the maintenance of biological diversity at the landscape and regional scale. Efforts were made, through the designation of Alternative Management Areas (AMAs), to represent the Land Type Associations (LTAs) and communities that had little to no representation under the 1986 Forest Plans. At the stand scale, guidelines pertaining to reserve trees, coarse woody debris, and other structural and compositional stand components will promote the maintenance or increase of diversity.

### Connectivity

**PC #: 10**

**Public Concern: The Chequamegon-Nicolet National Forests should improve ecological connectivity by acquiring county owned lands.**

**Response:** The purchase of lands by the Chequamegon-Nicolet National Forests is generally done on a site-specific basis and is not an area of consideration in the plan revision process. Priorities for land acquisitions can be found in Chapter 2 (Standards and Guidelines) of the 2004 Forest Plan.

**PC #: 268**

**Public Concern: The Chequamegon-Nicolet National Forests should manage**



**the two national scenic trails as major components of the ecological corridor system.**

**Response:** The National Scenic trail system was designed to provide opportunities to explore the nation's heritage through its scenery, natural environment, and cultural and historical features. Although these trails may provide some characteristics that are beneficial to rare or endangered species as an indirect effect of activities performed to maintain their high scenic integrity, maintaining or enhancing the trails' recreational values is the primary focus of management. The Chequamegon-Nicolet National Forests do not have an "ecological corridor system". Instead, the 2004 Forest Plan provides for connectivity at the landscape level through management area allocation.

**PC #: 267**

**Public Concern: The Chequamegon-Nicolet National Forests should link Alternative Management Areas together with logical landscape connections.**

**Response:** In the development of the Selected Alternative from Alternative 5, over 102,000 acres of Alternative Management Areas (AMAs; MA 2B, 3B, 4B and 4C) were added. This brings the total acreage of AMAs to 263,300 acres, which is approximately 18% of the Forests' total land base. Under Alternative 5, approximately 11% of the land base was designated as AMA. The additional AMAs were chosen based on their 1) overlap with MA 8E, 8F and 8G areas, 2) vegetation composition and landscape-scale structure, 3) rank in the Landscape Analysis and Design (LAD) Inventory, 4) presence of inventoried sensitive species, and 5) amenability to community restoration.

Establishment of connecting corridors between Federally-designated Wilderness (MA 5), recommended Wilderness Study Areas (MA 5B), Semi-Primitive Non-Motorized areas (MA 6A—low disturbance), Wild, Scenic, and Recreational River corridors (MA 8D), Candidate and designated Research Natural Areas (MA 8E), Special Management Area (MA8F), Old Growth and Natural Feature complexes, and northern hardwood interior forest (MA 2B) may be important to sustaining population of some animal species, such as those that have large home ranges (e.g. gray wolf). Connectivity was one of the criteria guiding the allocation of these and other management areas. For an analysis of the connectivity among these areas, please see the effects section on Land Patterns in Chapter 3 of the FEIS.

Riparian areas are also thought to provide landscape connectivity. In recognition of this, objectives, standards, and guidelines call for maintenance of conifer thermal cover in riparian areas, emphasis on long-lived conifer and northern hardwoods within 450 feet of selected trout streams, and expansion of riparian management zones wider than those defined in Wisconsin's Forestry Best Management Practices when necessary (e.g. steep slopes, highly erodible soils).

## Fish and Wildlife

**PC #: 656**

**Public Concern: The Forest Plan should include goals and objectives for fish and wildlife management similar to those adopted by the Superior-Chippewa National Forests.**

**Response:** The goals and objectives for fish and wildlife in the 2004 Forest Plan differ from those proposed by the Chippewa National Forest's 2003 Draft Forest Plan in four important ways. First, what the Chippewa's plan includes as objectives for the various wildlife species are similar to the species-specific guidelines provided in the

Chequamegon-Nicolet's 2004 Forest Plan. Second, other objectives in the Chippewa plan reiterate management direction that is prescribed by law or Forest Service policy. Since compliance with these policies is mandatory, they were not included as objectives in the Chequamegon-Nicolet's Forest Plan. Third, the Chippewa's Plan proposes fewer management areas (MAs) than does the Chequamegon-Nicolet's 2004 Forest Plan and, as a consequence, must include more detailed forestwide goals and objectives to insure the viability of species found on the Forest. In the Chequamegon-Nicolet's 2004 Forest Plan, each management area provides specific direction for desired future condition, standards and guidelines, and vegetation management that were developed with consideration of species viability and habitat integrity; the allocation and spatial arrangement of the various MAs on the Forests will help achieve these ends. Fourth, the Chequamegon-Nicolet's 2004 Forest Plan includes the desired future condition for aquatic resources (Chapter 3), which provides management direction for aquatic habitats similar to the goals and objectives for aquatic resources in the draft Chippewa Plan. In conclusion, although the Chequamegon-Nicolet's 2004 Forest Plan and the Chippewa National Forest's Draft Plan are formatted differently, both afford protection to aquatic and terrestrial wildlife species.

**PC #: 264**

**Public Concern: The Forest Plan should include an objective requiring the Chequamegon-Nicolet National Forests to consult with the State of Wisconsin on the management of wildlife.**

**Response:** Goals describe desired future conditions and are normally expressed in broad general terms. Forest plan goals are tied to broad, agency-wide goals that are set forth in law, executive orders, regulations, agency directives, and the Resources Planning Act (RPA) program. Achievement of goals is not mandatory, and there is no established timeframe for accomplishment. Objectives are statements of measurable desired results intended to promote the achievement of Forest Plan goals.

Existing USDA Forest Service policy includes the following (Forest Service Manual 2610.3):

1. Recognize the role of the States to manage wildlife and fish populations within their jurisdictions and the responsibility of the Fish and Wildlife Service to manage fish and wildlife resources within its authority.
2. Recognize the State fish and wildlife agencies as a public agency with management responsibilities for wildlife on the National Forests and include them as partners in planning and implementation of activities that affect wildlife and fish.

Existing policy does not need to be restated in the Forest Plan. Consultation with the Wisconsin Department of Natural Resources took place throughout the planning process.

## Habitat Protection

**PC #: 42**

**Public Concern: The Forest Plan should include habitat protection measures.**

**Response:** Buffer zones around Regional Forester's Sensitive Species (RFSS) and Threatened and Endangered Species occurrences (including nest sites/areas) are proposed in the 2004 Forest Plan. According to a forestwide guideline in the 2004 Forest Plan, vegetation management within 100 to 500 feet of RFSS plant and animal sites as well as larger areas near goshawk sites (such as nest or den sites) will be limited to practices that

maintain or enhance habitat and micro-habitat conditions. Establishment of connecting corridors between Federally-designated Wilderness, recommended Wilderness, Semi-Primitive Non-Motorized Low Disturbance areas, Wild, Scenic, and Recreational River Corridors, Research Natural Areas, Candidate Research Natural Areas, Special Management Areas, Old Growth and Natural Feature Complexes, and northern hardwood interior forest (MA 2B) may be important to sustaining populations of some animal species, such as those that have large home ranges (e.g. gray wolf). Connectivity was one of the criteria guiding the allocation of these and other management areas. For an analysis of the connectivity among these areas, please see the effects section on Land Patterns in Chapter 3 of the FEIS.

**PC #: 288**

**Public Concern: The Chequamegon-Nicolet National Forests should reexamine the appropriateness of the standards and guidelines for species on the edge of their range.**

**Response:** Black-backed woodpecker and some other RFSS species on the periphery of their range have declined in recent years for a number of reasons. In the case of the black-backed woodpecker, fire suppression and post-fire salvage logging have reduced the amount of available foraging habitat compared to historic conditions. Other species at the edge of their range, such as Henry's elfin butterfly and the sharp-tailed grouse, have been negatively affected by habitat loss or fragmentation.

The effects of climate change are predicted to be complex. For species at the edge of their range in northern Wisconsin, a northward range shift is likely. This could lead to an increased dependence on habitat in the Chequamegon-Nicolet National Forests for those species.

**PC #: 275**

**Public Concern: The Forest Plan should protect habitats by restricting interior traffic.**

**Response:** Respondent(s) expressed concern about threatened bird and animal habitat. Goals and Objectives (Chapter 1), and Standards and Guidelines (Chapter 2) in the 2004 Forest Plan provide direction that conserves and restores populations of endangered, threatened, and sensitive species, as well as improving habitat conditions for Regional Forester's Sensitive Species. In addition allocation of MA2B as displayed in Chapter 2 of the FEIS varies across alternatives and benefits area-sensitive species.

## **Aquatic Species**

**PC #: 274**

**Public Concern: The Chequamegon-Nicolet National Forests should increase the number of fish habitat improvement projects, emphasizing heavily fished waters.**

**Response:** The 2004 Forest Plan provides guidance for fisheries habitat improvement work through forestwide standards, guidelines, objectives and the Aquatic Desired Future Condition. The decision to work on a specific lake is made at the project level.

**PC #: 284**

**Public Concern: The Chequamegon-Nicolet National Forests should document the effects of past timber harvest on salamanders.**

**Response:** Salamanders have been studied on the Forests. Sampled ponds were in a variety of forest types and covered a range of silvicultural treatments. Although sample sizes have been small, woodland ponds on the Forests have shown healthy salamander assemblages. In addition, the Forests have participated in the Wisconsin Department of Natural Resources' spring frog and toad surveys for at least ten years.

## Game Species

**PC #: 508**

**Public Concern: To protect game species, the Chequamegon-Nicolet National Forests should adopt an alternative other than 5.**

**PC #: 279**

**Public Concern: The Forest Plan should improve the habitats of socially and economically important species.**

**Response:** Goal 1.5 of the 2004 Forest Plan is to conserve habitat capable of supporting viable populations of existing native and desired non-native species and to retain the integrity and function of key habitat areas. A number of sensitive species (e.g. Regional Forester's Sensitive Species) require habitat components that are underrepresented on the Chequamegon-Nicolet today. Restoration of these habitat components (e.g. mature northern hardwoods, interior forest conditions) comes at the expense of early successional habitats and may have negative impacts on species like white-tailed deer and ruffed grouse that are associated with these habitat types.

In this respect, the 2004 Forest Plan provides a balance between competing demands for use of the Forests' resources. Despite the reduction in early successional habitat types, aspen-emphasis management areas (MA 1A, 1B and 1C) will amount to approximately 20% of the Forests' total land base and will continue to provide habitat for game species that prefer early successional vegetation. Additional early successional habitat types will continue to be created through natural disturbance processes. As another example of balance between competing resources, trout stream management and beaver management often conflict because beaver activity tends to diminish a stream's potential as a trout fishery. Under the 2004 Forest Plan (Objective 1.5b), the Chequamegon-Nicolet will cooperate with the Wisconsin DNR to maintain beaver populations on the landscape while, at the same time, maintaining cold water fisheries in generally free-flowing condition. Responding to this objective will help achieve a balance between these resources.

**PC #: 661**

**Public Concern: The Final EIS should note the presence of moose in the Chequamegon-Nicolet NF, and account for their role within the forest.**

**Response:** On occasion, a moose is known to wander into the Chequamegon-Nicolet National Forest from neighboring populations in Michigan, but on each occasion it ultimately returns to Michigan. With no established population on the Forest, the moose was not addressed specifically.

**PC #: 15**

**Public Concern: The Forest Plan should reduce white-tailed deer habitat.**

**PC #: 663**

**Public Concern: The Forest Plan should establish large areas managed for low deer density.**

**PC #: 330**

**Public Concern: The Chequamegon-Nicolet National Forests should protect important tree and plant species from excessive deer browsing.**

**Response:** The Chequamegon-Nicolet National Forests are responsible for managing habitats for many wildlife species. The State of Wisconsin has the authority to directly manage wildlife populations, such as white-tail deer, and does so by setting goals, seasons, and the harvest, and by providing micro-management on State lands.

White-tailed deer utilize young aspen browse and feed heavily on the growth produced in clearcuts. Deer browsing is recognized as a major risk to forest understory vegetation on the Chequamegon-Nicolet National Forests. While factors other than habitat, such as winter severity and hunting, also affect deer populations, it is likely that long term decreases in the aspen forest type could contribute to some reductions in the deer population.

The principle tool for addressing this issue in the 2004 Forest Plan is through the allocation of management areas (MAs) across the landscape. Management area allocations in all alternatives tend toward a decrease in the aspen forest type. The Selected Alternative and 2004 Forest Plan maintain ecological conditions that could result in local declines in deer populations and deer herbivory over the long term due to changes in available forage. Direction for the restoration of Canada yew can be found in Forestwide Standards and Guidelines (Chapter 2) in the 2004 Forest Plan.

**PC #: 280**

**Public Concern: The Forest Plan should provide for elk viewing sites.**

**Response:** The establishment of elk viewing areas is a site-specific decision that would be analyzed during the project level decision-making process. It is also at this level that additional funding or labor outside the agency could be sought.

## **Avifauna**

**PC #: 283**

**Public Concern: The Forest Plan should protect bird habitat from further fragmentation.**

**Response:** The Chequamegon-Nicolet 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 2004 Forest Plan. Forestwide Standards and Guidelines provide direction for Threatened, Endangered and Sensitive Species, as well as Regional Forester's Sensitive Species.

The management of National Forests provides for the use of renewable forest resources in a combination that best meets the needs of the American people. The 2004 Forest Plan strives to achieve a balance in the protection of habitat for birds, fish, and other wildlife.

**PC #: 294**

**Public Concern: The Forest Plan should protect native bird species by preserving wide riparian corridors.**

**Response:** The Forest Service acknowledges that riparian corridors will be important to maintaining healthy populations of many native bird species including many migrant species. In recognition of this, conifer thermal cover will be maintained in riparian areas; long-lived conifer and northern hardwoods will be emphasized within 450 feet of selected Class I, II, and III trout streams; and riparian management zones will be expanded when necessary beyond those called for by Wisconsin's Forestry Best Management Practices (e.g. steep slopes, highly erodible soils).

**PC #: 678**

**Public Concern: The Forest Plan should provide for bird habitat by managing for varied successional stages and forest compositions.**

**Response:** Biological diversity was one of the four major topics addressed during forest plan revision. The Forests' managers acknowledge the need for ecosystem restoration, old growth areas, and landscape-level management of resources to promote species viability and to enhance ecosystem function. To that end, the 2004 Forest Plan and the Selected Alternative accommodate species associated with various successional stages through management area allocation and promote heterogeneity in stand composition through forestwide and management area-specific guidelines. Additionally, important habitat features such as canopy closure, patch size, and structural complexity receive much greater emphasis in the 2004 Forest Plan than they did in the 1986 Plans.

**PC #: 282**

**Public Concern: The Forest Plan should acknowledge the Chequamegon-Nicolet Forests' importance to migratory bird species.**

**Response:** Data from the Nicolet National Forest Bird Survey, the Wisconsin Breeding Bird Atlas Project, and the North America Breeding Bird Survey all reveal short-term and long-term negative population trends for bird species in many habitat associations. The 1986 Plans place a strong emphasis on species adapted to early successional vegetation. The 2004 Forest Plan, however, attempts to ensure the distribution, abundance, and habitat requirements of species adapted to mature forest. Not all bird species that have shown negative population trends fall into these two habitat affinity groupings. For instance, black-throated blue warblers and Canada warblers prefer conifer (pine/hemlock/maple), and the Connecticut warbler prefers oak/jack pine stands.

The 2004 Forest Plan attempts to improve habitat for all of these species through standards and guidelines pertaining to conifer understory composition, riparian management, reserve trees, and age class distributions. More detailed discussions of the impacts on bird species of the reduced emphasis on early-successional forest types are available in the planning record (see the following two documents: *Analysis Of The Impact On Avifauna Of Reduced Young Aspen Coverage In Wisconsin* and *Effects Considerations for USFWS Conservation Priority Bird Species Under the Chequamegon-Nicolet Forest Plan Alternatives*).

**PC #: 680**

**Public Concern: The Forest Plan should set bird recovery objectives that other areas cannot address.**

**Response:** The comment letter (#1292) that generated this public concern advocates the maintenance/restoration of large blocks of mature/old interior forest on the



Chequamegon-Nicolet, something that cannot be done elsewhere in the Partners-in-Flight Bird Conservation Region #12. Through the allocation of management areas with little or no vegetation management (MA 5, 5B, 6A, 8D, 8E, 8F and 8G) and Alternative Management Areas (MA 2B, 3B, and 4B), more mature/old interior forest will be developed and managed under the 2004 Forest Plan than under the 1986 Plans. As these habitats decline in abundance on other ownerships in the Partners-in-Flight Bird Conservation Region #12, mature/old interior forest on the Chequamegon-Nicolet will become increasingly important to bird species requiring interior forest conditions.

**PC #: 679**

**Public Concern: The Forest Plan should focus on bird species with narrow habitat requirements rather than generalist species.**

**Response:** Important habitat features for bird species listed as either Threatened and Endangered Species (TE) or Regional Forester's Sensitive Species (RFSS) were identified. Effects analyses for all alternatives are provided in the FEIS and Biological Evaluations (FEIS Appendix J). Additional analyses of the effects of the various alternatives on bird species other than those listed as TE or RFSS were completed and are available in the planning record. In general, the bird species that were examined have narrow habitat requirements and are sensitive to habitat and landscape changes. The multi-scale approach to species conservation taken by the 2004 Forest Plan accommodates species with very specific habitat requirements by managing stand structure and composition while accommodating more general species through landscape-level management area allocations and juxtaposition.

**PC #: 281**

**Public Concern: The Forest Plan should protect the habitat of woodland raptors.**

**Response:** The National Forest Management Act recognizes even-aged management (clearcutting) as one of many acceptable practices that achieve multiple use objectives in accordance with the Multiple-Use Sustained Yield Act of 1960. Silvicultural Standards and Guidelines in the 2004 Forest Plan provide language that will effectively direct the proper use of clearcutting on the Forests and minimize impacts to other forest resources. Forestwide Standards and Guidelines also provide for the protection of soils, aquatic resources, scenery, and other recreational resources when using clearcutting harvest.

Forestwide Standards and Guidelines (Chapter 2) in the 2004 Forest Plan prohibit even-aged management near northern goshawk and red-shouldered hawk active and historic nest sites. Please see Chapter 2 for more detailed Standards and Guidelines for northern goshawk and red-shouldered hawk.

The Chequamegon-Nicolet National Forests recognize the value of downed woody debris and snags to many species of wildlife. Forestwide Standards and Guidelines (Chapter 2) and Management Area Standards and Guidelines (Chapter 4) in the 2004 Forest Plan provide direction for the retention and establishment of these as appropriate.

It is the role of the Chequamegon-Nicolet National Forests to restore, enhance, and maintain wildlife habitat. The fisher was an extirpated species that was reintroduced. Trapping controls fisher populations in some areas with regulations established by the Wisconsin Department of Natural Resources.

Forestwide Standards and Guidelines in Chapter 2 of the 2004 Forest Plan provide direction for soil disturbing activities as a result of timber harvest or motorized vehicle use. They would be applied on a site-specific basis during project level analysis.

**PC #: 298**

**Public Concern: The Chequamegon-Nicolet National Forests should base species priority and management strategies on the Partners in Flight landbird conservation plan.**

**Response:** As of January, 2003, the Partners in Flight Landbird Conservation Plan for the Boreal Hardwood Transition (which includes the Chequamegon-Nicolet National Forests) was still unfinished. Peer review of this Conservation Plan will begin in spring 2004 and the plan should be available soon after. When it becomes available, its recommendations will be evaluated and, if needed, amendments to the 2004 Forest Plan will be made.

**PC #: 277**

**Public Concern: The Chequamegon-Nicolet National Forests should continue the census of small passerine birds.**

**Response:** The Forests acknowledges the value of Breeding Bird Survey data and will continue to cooperate with Federal and State agencies as well as other researchers in the monitoring of birds on the Forests.

**PC #: 14**

**Public Concern: The Forest Plan should protect heron rookeries by restricting logging.**

**Response:** Guidelines in Chapter 2 of the 2004 Forest Plan provide direction for the protection of heron colonies and rookeries.

**PC #: 278**

**Public Concern: The Forest Plan should require bat population monitoring.**

**Response:** Discussions among CNNF specialists have begun regarding the collection of baseline inventory data for bats on the Forests. It is possible that this inventory and baseline data may lead to monitoring of bat species or their use as indicators. Currently, however, there is not enough information available on bats on the Forests to warrant inclusion in the 2004 Forest Plan.

## Insects

**PC #: 665**

**Public Concern: The Forest Plan should protect butterfly congregation sites through road closures.**

**Response:** Road closures (June 1-August 15) were considered as a protection measure for congregation (puddling) sites of the Northern Blue Butterfly. They were not considered for the West Virginia White Butterfly because the species is an interior forest specialist and puddling behavior is not common. Road closures were not discussed by Species Viability Evaluation panelists as protection measures for the Henry's Elfin, Chryxus Arctic, and the Tawny Crescent Butterflies because the panelists were more concerned about the amount and quality of barrens and surrogate barrens habitat.

## Threatened, Endangered, and Sensitive Species

**PC #: 666**

**Public Concern: The Forest Plan should include clear and specific goals for the conservation of threatened and endangered species.**

**Response:** Following the publication of the DEIS, goals, standards and guidelines were revised to make them clearer to the public and Forest Service personnel. These changes are reflected in Chapters 1 and 2 of the 2004 Forest Plan.

**PC #: 286**

**Public Concern: The Forest Plan should include flexible standards and guidelines for the protection of threatened and endangered species.**

**Response:** The Chequamegon-Nicolet National Forests recognize that there is a need to protect threatened and endangered species. Standards and Guidelines with unambiguous distance restrictions provide clear guidance for management activities and ensure a threshold level of protection for the species.

**PC #: 287**

**Public Concern: The Final EIS should include a summary of the research applied to the standards and guidelines for each threatened, endangered, and sensitive species**

**Response:** Published research and unpublished work in the form of draft reports and scientific conference presentations are available as part of the planning record. Additional information such as meeting notes, emails, and transcripts of telephone conversations with researchers and other species experts is also available in the planning record. Information from all of these sources was used in the development of the standards and guidelines of the 2004 Forest Plan as well as the effects analyses documented in Chapter 3 of the FEIS.

**PC #: 673**

**Public Concern: The Final EIS should include a biological evaluation that adequately analyzes the cumulative effects on threatened, endangered and Regional Forester Sensitive Species.**

**Response:** The Species Viability Evaluation panel experts provided their best estimates of the historic (pre-settlement) population status of the Threatened and Endangered Species (TES) and Regional Forester's Sensitive Species (RFSS). Given the population/occurrence information and scientific literature for TES and RFSS that was available at the time, the panelists provided their estimates of the current status of the TES and RFSS within the National Forests and the Cumulative Effects Area (CEA). These current estimates incorporated the effects of implementation of the 1986 Forest Plans and also included the effects of activities on other areas within the CEA. Finally, the expert panelists were provided with drafts of the forest plan and the alternatives to estimate their potential effects on TES and RFSS for the foreseeable future (extending 100 years from present). The development of the Selected Alternative from Alternative 5 included improvements suggested by SVE panelists.

**PC #: 607**

**Public Concern: The Forest Plan should require maintenance of viable populations of native and desired non-native species across the planning area.**

**PC #: 659**

**Public Concern: The Forest Plan should list all Regional Forester Sensitive Species along with adequate management guidelines and population targets for each species.**

**Response:** It is impractical to set population targets for Regional Forester's Sensitive Species (RFSS) and native and desired non-native species. The primary means used by the Forests to promote species persistence/recovery and population viability in the 2004 Forest Plan is through the provision of suitable habitat and/or enhancing connectivity between suitable habitat patches. Whether or not available habitat is utilized by RFSS or native or desired non-native species is beyond the Forests' control, except when the species are introduced to the area through relocation from other areas or through planting/seeding.

The promotion of population viability was an important criterion in the desired future condition of the management areas as well as their arrangement on the landscape. Standards and guidelines for RFSS, TES, and other species are provided in the 2004 Forest Plan. Species that require similar management actions to maintain or increase the size of their populations were grouped together. For example, RFSS plant species found in Forested Wetland habitat affinity grouping all would benefit from management that reduces mammalian herbivory and limits road construction and beaver activities in wetlands. Species with particular resource requirements, such as butterflies with host-plant associations, have specific guidelines in recognition of these close associations.

**PC #: 660**

**Public Concern: The Final EIS should explain the ranking of environmental impacts to Regional Forester Sensitive Species**

**Response:** A list of the Species Viability Evaluation (SVE) participants and a description of the SVE process is included in the planning record. Those species that were historically rare have D or E outcomes for the Historical situation as indicated by SVE panelists. Outcome results for each species or group of species are available in the planning record.

**PC #: 297**

**Public Concern: The Final EIS should give special consideration to the U.S. Fish and Wildlife's Resource Conservation Priorities species.**

**Response:** Species listed as Resource Conservation Priorities were given consideration during the development of the 2004 Forest Plan. Some of those species are also on the Regional Forester's Sensitive Species list and are considered in detail in the Biological Evaluations (Appendix J of the FEIS). For the remainder, a supplementary analysis was completed and is available in the Planning Record.

**PC #: 592**

**Public Concern: The Chequamegon-Nicolet National Forests should protect the pine marten by establishing roaded natural remote areas in the Park Falls and Great Divide Ranger Districts.**

**PC #: 672**

**Public Concern: The Forest Plan should include standards and guidelines that adequately protect and restore the pine marten.**

**Response:** Between the draft and the final versions of the 2004 Forest Plan, guidelines pertaining to reserve trees and snags were improved to better protect American (pine) marten populations on the Forests. In general, forestwide guidelines emphasizing the retention of snags and live trees recruited as future snags will improve habitat conditions for American marten. The gradual accumulation of coarse woody debris will further enhance habitat on the Forests over the life of the 2004 Forest Plan. Additional protection is afforded to the marten by the enforcement of dry-land trapping closure areas on the Forests in the vicinity of marten reintroduction areas. Finally, the 2004 Forest Plan includes a guideline that will leave some potential salvage areas unharvested within marten habitat to enhance suitable denning and foraging sites.

**PC #: 671**

**Public Concern: The Forest Plan should include standards and guidelines that adequately protect and restore the goshawk.**

**Response:** The forestwide guidelines regarding goshawks were substantially revised between the draft and final versions of the 2004 Forest Plan to better protect goshawk nesting areas and high quality habitat. Take permit allowance is based on Erdman *et al.*'s goshawk productivity estimates from over 22 years of data from northern Wisconsin. Goshawk take by falconers is only permitted when the available young are likely to represent surplus individuals. Red-tailed hawk is not considered to be an important predator of goshawk in northern Wisconsin because red-tailed hawks forage in open areas, not in the interior of forested patches where goshawk nesting occurs.

**PC #: 658**

**Public Concern: The Final EIS should clearly and honestly articulate anticipated impacts on the goshawk population.**

**Response:** The FEIS and the Biological Evaluations (BE; Appendix J of the FEIS) recognize that threats to goshawk include loss of nesting sites as a direct result of forest fragmentation and other forms of habitat alteration, collection for falconry, and increased predation by great-horned owl and fisher. The severity of these threats varies by alternative. In the BE, discussion of the threat of forest fragmentation and habitat alteration focuses around four key factors: 1) habitat with adequate prey, 2) nesting habitat, 3) habitat fragmentation, and 4) nest site disturbance. The Forests can control these factors on National Forest land and expect that the direction provided by the 2004 Forest Plan will lead to substantial gains in providing/maintaining suitable habitat for goshawk. However, these gains may be offset somewhat by habitat losses on other ownerships.

**PC #: 590**

**Public Concern: The Chequamegon-Nicolet National Forests should protect wolves by expanding roaded natural remote areas in the Great Divide District.**

**Response:** Total and open road density limits are intended to place priority on road closures. They are not a goal for road construction. In addition, there is variation in the definition of a "road." In the Wisconsin Wolf Recovery Plan, a road is defined as a travelway that 2-wheel-drive vehicles may travel. This definition fits the description of Forest Service Maintenance Level 3-5 roads. According to the Wolf Recovery Plan, road density of an area should be 1.0 mi/mi<sup>2</sup> or less in order to be considered wolf habitat. Currently, the average total road density of all Maintenance Level 3-5 roads on the Chequamegon-Nicolet National Forests is 1.0 mi/mi<sup>2</sup>.

The 2004 Forest Plan calls for an overall average total road density of 3.0 mi/mi<sup>2</sup>, including roads too rugged for passenger car travel and those closed to public use. Existing total road density on the Forests is 3.9 mi/mi<sup>2</sup>. Therefore, total road density is likely to decrease forestwide under the 2004 Forest Plan. Other species sensitive to human disturbance, like the American marten, are also likely to benefit from maintaining or reducing currently low road densities in some areas of the Forests.

**PC #: 290**

**Public Concern: The Forest Plan should apply use restrictions in wolf habitat only during the denning season.**

**PC #: 668**

**Public Concern: The Forest Plan should include standards and guidelines that address high road densities in the Nicolet NF and their effects on wolf conservation.**

**Response:** In the 2004 Forest Plan, although road density limits are placed on suitable wolf habitat (WDNR Wolf Probability indices greater than 50), land use activity restrictions apply only to the buffer areas around den and rendezvous sites. The year-round restriction applies only to the area within 330 ft (an area of approximately 8 acres) of the wolf den or rendezvous site. Only during the denning season (March 1-July 31) is this buffer area extended to a radius of ½ mile (approximately 500 acres). The *year-round* restriction on land use within that 8 acre area serves two main purposes: 1) to limit human interference with wolf activity in these high use areas, and 2) preserve site/microsite features that lead to the selection of the area as a denning or rendezvous site.

Average total road densities are expected to decrease over time to meet Goal 3.1 that states, "Progress toward the Forestwide average total road density goal of 3.0 miles per square mile established in 1986."



**PC #: 667**

**Public Concern: The Forest Plan should include standards and guidelines for lynx recovery and protection.**

**PC #: 461**

**Public Concern: To preserve lynx populations, the Chequamegon-Nicolet National Forests should not implement the proposed thinning prescriptions for aspen, mixed conifer, and northern hardwoods.**

**Response:** Based on the latest scientific information, there are no Canada lynx breeding populations in Wisconsin. Lynx are occasionally sighted in northern Wisconsin but these individuals are believed to be visitors from northern Michigan or Minnesota.

**PC #: 285**

**Public Concern: The Forest Plan should include the golden-winged warbler on the forest sensitive species list, and the Final EIS an analysis of the impacts of the Plan's forest management goals on this species.**

**Response:** Species are added to the Regional Forester's Sensitive Species list if they occur within the Forests and: 1) are candidates for Federal listing under the Endangered Species Act (ESA), 2) were delisted under ESA in the last five years, 3) have a global, trinomial or national rank of 1-3 by The Nature Conservancy and Nature Serve, or 4) are considered sensitive by national forests based on risk evaluations. As of November 2003, the golden-winged warbler does not meet these criteria. The effects of the 2004 Forest Plan (and the various alternatives) on the golden-winged warbler were analyzed, however, and are discussed in the FEIS. A more thorough discussion of the effects is available in the planning record. (See the following two documents: *Analysis Of The Impact On Avifauna Of Reduced Young Aspen Coverage In Wisconsin* and *Effects Considerations for USFWS Conservation Priority Bird Species Under the Chequamegon-Nicolet Forest Plan Alternatives*.)

**PC #: 289**

**Public Concern: The Chequamegon-Nicolet National Forests should allow disturbances in threatened and endangered species' habitat when those species are absent and when alternative habitat is available.**

**Response:** The Forests' primary means of protection of Threatened and Endangered Species (TES) and Regional Forester's Sensitive Species (RFSS) is the restoration, creation or maintenance of suitable habitat for the species. Disturbances are allowed in the habitat of TES and RFSS on a case-by-case basis. The presence of TES and RFSS individuals in the project area during the disturbance certainly is considered in the effects analysis prior to the disturbance activity.

**PC #: 438**

**Public Concern: The Forest Plan should protect wolves and bald eagles from illegal shooting and trapping by increasing the number of non-motorized areas.**

**Response:** The Selected Alternative increases the areas allocated to non-motorized access over the existing condition. Some of the other alternatives, however, place an even greater emphasis on non-motorized areas. Average total and open road densities will not increase on the Forests during implementation of the 2004 Forest Plan; in fact, they are likely to decrease. Consequently, species sensitive to the road-related disturbances, such as wolves, are likely to benefit from this change.

**PC #: 528**

**Public Concern: The Forest Plan should protect species that require large remote areas by restricting motorized use.**

**Response:** The response to this Public Concern is located in the “Road Densities” section of this Appendix.

**PC #: 165**

**Public Concern: The Forest Plan should protect the habitat of threatened, endangered, and sensitive species.**

**Response:** The Chequamegon-Nicolet National Forests provides direction for the restoration, maintenance, and enhancement of wildlife habitat through the Goals, Objectives, Standards and Guidelines and Management Areas prescriptions in the 2004 Forest Plan. Standards and Guidelines in the 2004 Forest Plan provide direction for Threatened, Endangered and Sensitive Species, and Regional Forester’s Sensitive Species.

The National Forests are managed to provide for the use of all the various renewable resources in a combination that best meets the needs of the American people. The 2004 Forest Plan strives to achieve a balance between competing resource uses.

**PC #: 276**

**Public Concern: The Forest Plan should protect rare and endangered species by prohibiting logging in their habitat.**

**Response:** Threatened, Endangered and Regional Forester’s Sensitive (TES) Species will be protected under the 2004 Forest Plan through the prohibition of vegetation management (e.g. logging) within 100-500 feet of known occurrences of most TES species and within larger areas for occurrences of species such as the goshawk, unless the practice maintains or enhances the habitat for the species. Furthermore, the development of management area standards and guidelines and the management area prescriptions themselves were guided, in part, by the need to better preserve or restore biological communities. Restoration provides protection to rare and endangered species by not only rehabilitating habitat for the species but also by re-establishing species interactions. Vegetation management (logging) may be required to maintain/create habitat for some sensitive species.

## Management Indicator Species

**PC #: 292**

**Public Concern: The Forest Plan should include a comprehensive list of management indicators.**

**PC #: 675**

**Public Concern: The Forest Plan should identify scientifically supportable management indicator species.**

**Response:** The Forests recognize the limitations of using Management Indicator Species (MIS); however, federal regulations (36 CFR 219.19(a)) require that MIS be used to evaluate the impacts of land and resource management practices in national forests. In theory, changes in the populations of MIS are believed to be related to the effects of management activities on the biological community. Unfortunately, there are very few species for which this relationship can be strongly established. Consequently, the use of MIS is much reduced in the 2004 Forest Plan when compared to the 1986 Plans. In

addition to those species designated as MIS, Regional Forester's Sensitive Species will be monitored during the implementation of the 2004 Forest Plan; these monitoring efforts will contribute to our evaluation of the health of the communities to which they belong. Finally, four vegetative communities have been designated as management indicators and will be monitored to evaluate restoration efforts. As a component of this monitoring, many bird species associated with these habitats will be monitored and are expected to fulfill some of the functions of MIS.

**PC #: 674**

**Public Concern: The Forest Plan should not include the bald eagle as a management indicator species.**

**Response:** The selection of the bald eagle as a management indicator species (MIS) is in compliance with a requirement of the National Forest Management Act (NFMA 36 CRF 219.19(a)(1)) and direction provided by the Forest Service Manual (FSM 2621.1). These regulations state that endangered and threatened plant and animal species identified on State and Federal lists for the planning area shall be selected as MIS (NFMA) and that Federally-listed endangered or threatened species shall be selected as management indicators if the forest or project plan potentially impacts those species, or if opportunities exist to enhance their recovery (FSM).

## **Vegetation**

**PC #: 684**

**Public Concern: The Chequamegon-Nicolet National Forests should not create temporary openings within the forest.**

**Response:** Temporary openings are the direct result of natural disturbances or even-aged management. Even-aged management is a valuable tool for regenerating early successional communities and makes important contributions to local economies by providing timber products and hunting opportunities.

**PC #: 41**

**Public Concern: The Final EIS should reconcile the scenic integrity objectives and management area vegetative and age-class objectives.**

**Response:** High and Moderate Scenic Integrity Objectives (SIO) apply to designated roads, trails, recreation use areas and water bodies. Guidelines specific to High and Moderate SIO areas apply, in addition to forestwide and management area-specific guidelines. If conflicts arise, the most restrictive guidelines are followed. The rest of the Forests are designated as low-SIO areas and restrictions, if any, are determined on a site-specific basis during project analysis.

## **Barrens Management**

**PC #: 300**

**Public Concern: The Forest Plan should expand the Moquah Pine Barrens.**

**Response:** The Moquah Pine Barrens area will be increased from approximately 8,000 acres (current conditions) to approximately 14,000 acres in all alternatives, including the Selected Alternative. Management of adjacent areas will be compatible with that of the Moquah Barrens. For instance, the Bladder Lake area to the southwest is designated as MA 3C in which temporary openings and small permanent openings are fairly uniformly

distributed and pockets of pine and oak barrens communities are restored within appropriate habitat types.

**PC #: 697**

**Public Concern: The Forest Plan should expand barrens management at the Riley Lake Wildlife Area.**

**PC #: 322**

**Public Concern: The Forest Plan should not expand barrens management at the Riley Lake Wildlife Area.**

**Response:** Open-land management (MA 8C) includes the Moquah Barrens and the Riley Lake Wildlife Area. The Riley Lake area, while not historically a Pine Barrens, requires similar management (i.e. disturbance regime) to maintain open-land conditions. Because of the similar management requirements, Moquah Barrens and Riley Lake were grouped into the same management area. Both the Moquah Barrens and the Riley Lake Wildlife Area provide habitat for barrens-associated species, some of which, like the sharp-tailed grouse, are on the Regional Forester's Sensitive Species list. The Selected Alternative, like Alternative 5 (the Preferred Alternative in the DEIS), provides for an expansion of the Riley Lake Wildlife Area.

**PC #: 317**

**Public Concern: The Forest Plan should protect core barrens areas embedded within compatible management areas.**

**Response:** Permanent pockets of pine and oak barrens will be restored within appropriate habitat types in areas designated as Management Area 3B, 3C, 4A, 4B and 4C. Of those management areas, MA 4B and 4C have higher allocations to permanent openings (2-8%) to allow for pocket barrens/savannas. Additional barrens areas are protected in MA 8E, 8F and 8G areas, especially on the Nicolet land base. Furthermore, the Moquah Pine Barrens core area will be expanded under the 2004 Forest Plan. While the Forests recognize that MA 4C areas are not a substitute for true barrens restoration, they will provide complementary habitat by providing large open patches for those species that favor these conditions.

**PC #: 321**

**Public Concern: The Forest Plan should designate a core managed barrens area in the Little Deerskin and Deerskin River Areas.**

**Response:** Designation of the Deerskin River Area (Polygon 9) as Management Area 4C in the 2004 Forest Plan accommodates the maintenance of permanent openings (pine barrens). Due to the relatively small size (hundreds of acres) of the existing barrens in this area (Polygon 9), MA 8C designation was not recommended by CNNF specialists. (See *Task Team 28: Opportunities for Pine Barrens Restoration on the Chequamegon-Nicolet National Forest, Outside of Moquah Barrens, Final Report of 9 Dec 1999* in the planning record.)

**PC #: 318**

**Public Concern: The Final EIS should consider the Southeast Pine Area on the southeast corner of the Lakewood Ranger District for barrens and dry forest restoration.**

**Response:** In areas designated as MA 4, permanent pockets of pine and oak barrens communities will be maintained/restored within appropriate habitat types. Under the Selected Alternative, polygons 89, 90, 91 and 92 (Southeast Pine Area) of the

Lakewood/Laona Ranger District are designated as MA 4A, 4B, 4B and 4C, respectively. This allocation differs from the Preferred Alternative (Alternative 5) in that Polygons 90 and 91 changed from MA 4A to 4B. This change allows for greater emphasis on pocket barrens, much less emphasis on aspen, and less edge habitat due to greater emphasis on large patch sizes.

**PC #: 320**

**Public Concern: The Forest Plan should maintain, connect, and expand the remaining open bracken grasslands in the Waubee/Jack Pine Camp Road Areas.**

**Response:** The Waubee Lake/Jack Pine Camp Road Areas (polygon 93) was designated as MA 3C under Alternative 5 and remains so under the Selected Alternative and 2004 Forest Plan. Within MA 3C, permanent openings such as pocket barrens will be maintained and restored within appropriate habitat types. Dwarf bilberry and Northern blue butterfly are known to occur in the barrens habitats in this area and will be afforded protection through forestwide guidelines pertaining to RFSS species. The 2004 Forest Plan also includes a guideline to create connecting corridors between dwarf bilberry populations where feasible. Finally, the maintenance and expansion of existing dwarf bilberry populations is one of the objectives (1.4d) of the 2004 Forest Plan. Maintenance and expansion of barrens habitats in MA 3C will utilize mechanical means (e.g. hand cutting) as well as prescribed burning.

**PC #: 319**

**Public Concern: The Final EIS should consider the area to the north of Thunder Mountain on the Lakewood Ranger District for barrens/bracken grassland restoration.**

**Response:** Polygon 73 on the Lakewood/Laona Ranger District is designated as MA 1B under the Selected Alternative and the 2004 Forest Plan. In this management area, pine and oak barrens community restoration may occur on appropriate habitat types and the Forests have already restored some barrens in this area. Additional barrens restoration is likely to occur in the surrounding polygons (#70 and #93), which are designated as MA 3C.

**PC #: 331**

**Public Concern: The Forest Plan should provide habitat for native barrens species by expanding pine barrens.**

**Response:** The Selected Alternative expands the Moquah Barrens Area and the Riley Lake Wildlife Areas (MA 8C) by a total of approximately 6,800 acres. Additional barrens areas will be provided in areas designated as surrogate pine barrens (MA 4C), although the size of the barrens openings will be hundreds of acres smaller than in the MA 8C areas. Nevertheless, these surrogate barrens are likely to provide habitat for many barrens-associated species. In addition, permanent pockets of pine and oak barrens are maintained in MA 3C areas and restoration of additional barrens in MA 3B will occur during implementation of the 2004 Forest Plan.

**PC #: 296**

**Public Concern: The Forest Plan should provide grassland bird habitat when appropriate.**

**Response:** Barrens habitat (e.g. Moquah Barrens) and other open-land habitat, such as the Riley Lake Wildlife Management Area, will be expanded under the Selected

Alternative and the 2004 Forest Plan when compared to the 1986 Plans. In addition, permanent pockets of pine and oak barrens communities are restored within appropriate habitat types in MA 1B, 3B, 3C, 4A, 4B and 4C. Barrens restoration may be undertaken in other management areas to meet permanent forest openings composition guidelines. To this end, the 2004 Forest Plan includes an objective (#1.41) to maintain and enhance existing barrens habitat and restore characteristics described in the desired future conditions for MA 8C. These areas will be treated as inclusions within other management areas. With the expansion of the Moquah Barrens and Riley Lake Wildlife Management Area, surrogate pine barrens management in MA 4C areas, and the restoration/maintenance of permanent openings such as pocket barrens within other management areas, habitat for "grassland" species (not limited to birds) will increase in abundance and quality during implementation of the 2004 Forest Plan.

**PC #: 687**

**Public Concern: The Chequamegon-Nicolet National Forests should use a combination of controlled fire and timber harvest to restore barren communities.**

**Response:** As is stated in the 2004 Forest Plan, prescribed burning is the primary management tool used to maintain barrens habitats such as in Moquah Barrens Area (MA 8C). Timber harvest, principally clearcutting, will be the primary disturbance in surrogate barrens areas (MA 4C) although prescribed burning will also be used as a restoration tool.

**PC #: 527**

**Public Concern: The Forest Plan should prescribe short rotation timber types within the areas surrounding the Moquah Barrens.**

**Response:** In the Selected Alternative and in the 2004 Forest Plan, Moquah Barrens is nearly surrounded by MA 3C. The disturbance regime in MA 3C is primarily even-aged vegetation management, which is used to maintain shade-intolerant species. Pockets of pine and oak barrens will be restored in appropriate habitat types.

## Snags, Downed Woody Debris, and Recruitment Trees

**PC #: 681**

**Public Concern: The Forest Plan should establish several 50,000 acre patches of interior hardwoods with high levels of large snags and large downed woody debris.**

**Response:** Under the Selected Alternative and the 2004 Forest Plan, interior hardwood conditions will be provided by two large northern hardwoods "core blocks" (Penokee Range: 76,000 acres; Alvin Block: 89,5000 acres) comprised of all MA 2B areas as well as selected MA 5B, 5 and 6A areas if northern hardwood composition is greater than 50 percent. Including Wild, Scenic, and Recreational River Corridors (MA 8D) and MA 2A (less than 20% aspen) areas with the "core blocks", the Selected Alternative provides six core blocks and six northern hardwood-dominated blocks that are greater than 20,000 acres in size. Within these areas downed logs greater than 10 inches in diameter will be retained and all dead snags and den trees will be reserved up to 10 trees/snags per acre with the largest trees emphasized. Additional snags will be recruited from live trees; recruitment from live trees is necessary in some areas due to the present lack of snags, especially in the larger size classes. American marten, known to prefer continuous mature upland deciduous forest, is likely to benefit from the large block management and emphasis on snag retention in the 2004 Forest Plan.



**PC #: 52**

**Public Concern: The Chequamegon-Nicolet National Forests should increase the amount of large, old growth snags.**

**Response:** Guidelines in the 2004 Forest Plan ensure the retention of more coarse woody debris (i.e. downed logs and snags) and the retention of a greater number of live trees (reserve trees) of various sizes in harvest areas than did the 1986 Forest Plans. The number of reserve trees per acre was arrived at based on the potential impacts the reserve trees have on regeneration of the stand and on the habitat/forage they may provide.

**PC #: 25**

**Public Concern: The Forest Plan should require retention of all snags, not to exceed 10 snags per acre.**

**Response:** Changes made between the draft and final versions of the 2004 Forest Plan respond to this concern. In the 2004 Forest Plan, snags will not exceed 10 per acre and the largest trees/snags will be emphasized.

**PC #: 688**

**Public Concern: The Forest Plan should include specific height and size guidelines for downed woody debris, standing snags, and recruitment trees.**

**Response:** Guidelines related to coarse woody debris were modified following public comment (see Chapters 2 and 3 of the 2004 Forest Plan). Guidelines in the Proposed Plan tended to be misleading, because the larger diameter trees required for downed logs and snags are present in very small numbers. For the same reason, height and size guidelines are somewhat general in the 2004 Forest Plan. Until increased numbers of larger diameter trees develop over time, more specific guidelines are superfluous. Also included in the 2004 Forest Plan is a guideline that emphasizes diversity, cover, and (or) mast through the reservation of trees that are poorly represented at the local or Forest-level. The 2004 Forest Plan includes Management Area-specific guidelines that specify the number of trees in each size class per acre that should be reserved.

**PC #: 689**

**Public Concern: The Forest Plan should manage red pine and white pine stands with an uneven-aged prescription that ensures recruitment of standing snags and downed woody debris.**

**Response:** The response to this Public Concern is located in the “Natural Resources (General)” section of this Appendix.

**PC #: 440**

**Public Concern: The Chequamegon-Nicolet National Forests should girdle or fell poor quality trees to provide cavity trees and coarse woody debris.**

**Response:** There are no guidelines that would prevent this from being proposed at the project level; the Forests are currently girdling some trees on a couple of projects. The Forests anticipate this practice will be expanded with the emphasis on coarse woody debris in the 2004 Forest Plan.

Natural recruitment will also accelerate as the stands on the Forests age. Many hardwood trees die, break off, and blow down prior to becoming 180 years of age. The 2004 Forest Plan includes guidelines that address the issue of cavity/snag tree and coarse woody debris recruitment. One guideline states that existing downed logs greater than 10 inches in diameter (small end) will be left in place and protected. In addition, up to 10 dead snags and den trees will be reserved per acre unless there is a safety concern. The largest

snags/trees available will be emphasized and snags felled for safety should be left as coarse woody debris. Recruitment of snags/den trees will come from live reserve trees.

**PC #: 413**

**Public Concern: The Forest Plan should clarify the policy on treating reserve trees that exceed the desired level of stocking within diameter classes.**

**PC #: 27**

**Public Concern: In stands targeted for uneven-aged management, the Forest Plan should require reservation of up to three live trees, greater than 17 inches in diameter, per acre.**

**PC #: 772**

**Public Concern: The Forest Plan should establish reserve tree guidelines of 25 square feet per acre in Management Areas 1 and 3.**

**PC #: 26**

**Public Concern: In even-aged regeneration harvests, the Forest Plan should require reserve islands totaling 1/2 acre for every 10 acres of clear-cutting.**

**Response:** Reserve tree numbers are included in uneven-aged stocking tables in the 2004 Forest Plan. While there is no requirement to retain exactly the same reserve trees during each harvest cycle, depending on tree characteristics, it is likely they would be reserved again. According to the stocking chart (Table 2-5), only one tree >25" per acre on average would be reserved.

The reserve tree guidelines in the proposed Forest Plan were reduced slightly in the 2004 Forest Plan due to some of the concerns raised by public comments. In Management Area 2B (and other Alternative Management Areas), the reserve tree guideline for uneven-aged management will now reserve 4-9 trees per acre greater than 11 inches with focus on the largest trees available. In the other management areas, the reserve tree guideline for uneven-aged management will now reserve 3-7 trees per acre greater than 11 inches with focus on the largest trees available.

Text will be added to Chapter 2 of other 2004 Plan indicating that in Table 2-4 and 2-5 reserve trees are part of the desired size class structure for uneven-aged hardwoods.

The reserve tree guidelines for even-aged management were also revised. Assuming we would be leaving the maximum reserve trees (5) called for by the guideline and that the trees averaged 16" in diameter, approximately 7 basal area would be left on site (outside of the reserve islands). While this would reduce the amount of aspen suckering on the site, it is felt an adequate stand of aspen would be regenerated under these conditions.

## Early-Successional (General)

**PC #: 295**

**Public Concern: The Forest Plan should maintain a mosaic of early-successional habitats to support bird species dependent on this habitat.**

**Response:** Because the Forests recognize the important contributions that early successional forests make to biodiversity at the landscape scale, early successional forest continues to be a strong emphasis in the 2004 Forest Plan. Allocations to early successional management areas (MA 1A, 1B, and 1C) amount to approximately 291,000 acres (nearly 20% of the total land base). Additional early successional areas will continue to be created on the Forests through natural processes such as blow-downs and

fires. Recent scientific literature shows that young aspen stands (<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 (<10 yrs old) will increase over the next two decades (estimated lifetime of the 2004 Forest Plan) while aspen habitats as a whole actually decrease. More detailed discussions of the impacts to bird species of reduced emphasis on early successional forest types are available in the planning record. (See the following two documents: *Analysis Of The Impact On Avifauna Of Reduced Young Aspen Coverage In Wisconsin* and *Effects Considerations for USFWS Conservation Priority Bird Species Under the Chequamegon-Nicolet Forest Plan Alternatives*.)

**PC #: 61**

**Public Concern: The Forest Plan should not diminish early-successional forest.**

**Response:** Ecosystem Restoration and Landscape Patterns were two components of the Biological Diversity topic that were addressed in the forest plan revision process. The *Report on the Scientific Roundtable on Biological Diversity Convened by the Chequamegon and Nicolet National Forests* (1994) states that northern Wisconsin forests today are younger, more fragmented, more even-aged, and contain more early successional species than the mostly old growth forest they replaced. Because species native to northern Wisconsin are adapted to the disturbance regimes, forest structures, and landscape patterns of that pre-settlement forest, the declines of many of the species on the Regional Forester's Sensitive Species list are attributed to the stark differences between existing and estimated historic conditions. *Roundtable* scientists determined that intensive management for early successional forest types has severe impacts on the biological diversity of the Forests.

Under the Selected Alternative, the needs of species associated with early successional forest will continue to be met on the CNNF through natural disturbances and the allocation of approximately 20% of the Forests' land base to management areas emphasizing early successional forest types (MA 1A, 1B, and 1C). However, significant improvements have been made in the 2004 Forest Plan in meeting the needs of late successional species, many of which are edge sensitive. These improvements are achieved through large block management, allowing some areas of the Forests to succeed naturally to late successional forest types, increasing allocations to old growth and developing old growth areas, and promoting greater structural and compositional diversity within stands of all age classes.

### **EARLY-SUCCESSIONAL TO PROTECT GROUSE AND WOODCOCK**

**Response:** From the comments that generated this public concern, it is understood that the respondent is concerned primarily with gamebirds such as grouse and woodcock. The effects of the Selected Alternative and 2004 Forest Plan on woodcock are uncertain at this time because of the lack of information on the species' habitat requirements. With respect to ruffed grouse, a reduction in the emphasis on early successional forest may have a small impact on population sizes. However, it is important to note that ruffed grouse population sizes are cyclic and these cycles are independent of aspen abundance. It is also important to note that under the current management direction (Alternative 1), 331,700 acres of the Forests would be aspen in 10 years. Under the Selected Alternative and 2004 Forest Plan, 329,900 acres would be composed of aspen forest type in 10 years. Projected aspen acreage in these two alternatives differs by just 0.5 % and, in fact, none of the alternatives vary by more than 1.6% from the current management direction. These aspen projections are derived from a model that does not account for the generation of

aspen from fire, blowdown, or other natural disturbances; therefore, these totals represent conservative estimates of aspen on the Forests. Taken together, it is difficult to envision any great changes in the abundance of ruffed grouse as a result of the reduced emphasis on early successional habitats in the 2004 Forest Plan.

### EARLY-SUCCESSIONAL TO PROTECT THE GOLDEN-WINGED WARBLER

**Response:** Because the Forests recognize the important contributions that early successional forests make to biological diversity at the landscape scale, early successional forest continues to be a strong emphasis in the 2004 Forest Plan. Allocations to management areas that emphasize early successional species (MA 1A, 1B, and 1C) amount to approximately 291,000 acres (nearly 20% of the total land base). Additional early successional areas will continue to be created on the Forests through natural processes such as blow-downs and fires.

Recent scientific literature shows that young aspen stands (<10 years old) and other shrub-dominated areas such as alder swamps are important to golden-winged warblers. Projections for the Selected Alternative show that aspen in this young age class will increase over the next two decades (estimated lifetime of the 2004 Forest Plan) while aspen habitat as a whole actually decreases. Under the Selected Alternative, and all other alternatives, vegetation management will not occur in lowland shrub habitats due to their sensitivity to disturbance. More detailed discussions of the impacts of the reduced emphasis on early-successional forest types on bird species are available in the planning record. (See the following two documents: *Analysis Of The Impact On Avifauna Of Reduced Young Aspen Coverage In Wisconsin* and *Effects Considerations for USFWS Conservation Priority Bird Species Under the Chequamegon-Nicolet Forest Plan Alternatives*.)

### EARLY-SUCCESSIONAL TO PROTECT NEOTROPICAL SONG BIRDS

**Response:** Because the Forests recognize the important contributions that early successional forests make to biological diversity at the landscape scale, early successional forest continues to be a strong emphasis in the 2004 Forest Plan. Allocations to management areas that emphasize early successional species (MA 1A, 1B, and 1C) amount to approximately 291,000 acres (nearly 20% of the total land base). Additional early successional areas will continue to be created on the Forests through natural processes such as blow-downs and fires.

Recent scientific literature shows that young aspen stands (<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 (<10 yrs old) will increase over the next two decades (estimated lifetime of the 2004 Forest Plan), while aspen habitat as a whole actually decreases. More detailed discussions of the impacts of the reduced emphasis on early-successional forest types on bird species are available in the planning record. (See the following two documents: *Analysis Of The Impact On Avifauna Of Reduced Young Aspen Coverage In Wisconsin* and *Effects Considerations for USFWS Conservation Priority Bird Species Under the Chequamegon-Nicolet Forest Plan Alternatives*.)

### EARLY-SUCCESSIONAL TO PRESERVE THE NORTHERN GOSHAWK

**Response:** The Forests acknowledge that northern goshawk utilize early successional forests as foraging areas; however, early successional forest and the prey they provide are not a limiting factor to goshawks. Nest site disturbance and the availability of suitable

nesting habitat, take by falconers, and nest predation are more immediate concerns for preserving goshawk on the Forests.

### **COMPENSATE FOR SHIFT FROM ASPEN ON PRIVATE TIMBER LANDS**

**Response:** The 2004 Forest Plan is intended to guide management decisions that apply to National Forest System lands. While conversions from aspen to mid-late successional forest types may occur on lands of other ownership, the Forest Service has no control over resource management activities on these lands. However, given that northern Wisconsin forests today are younger, more fragmented, more even-aged, and contain more early successional trees than the mostly old growth forest that they replaced and that declines of many of the species on the Regional Forester's Sensitive Species list are attributed to the stark differences between the existing and estimated historic conditions, the 2004 Forest Plan places considerably less emphasis on intensive management for early successional forest types than the 1986 Plans.

**PC #:** 435

**Public Concern:** The Chequamegon-Nicolet National Forests should prepare for an intensification of disease and mortality of aspen resulting from repeated, short rotations.

**Response:** It is not believed that the rotation lengths being used for aspen in the 2004 Forest Plan will lead to issues of intensified disease and/or mortality. Monitoring and evaluation of Plan implementation, as well as continued monitoring of scientific literature, will be done to indicate whether such a physical result begins to be demonstrated on the Forests or whether scientific studies indicate such an expectation. Based on such information, a Forest Plan amendment could be considered.

### **Uneven-aged Hardwoods**

**PC #:** 692

**Public Concern:** The Forest Plan should enhance the viability of a variety of species by prescribing uneven-aged management for northern hardwoods.

**PC #:** 407

**Public Concern:** The Forest Plan should retain the 24 inch upper diameter limit for 2A and 2C Management Areas.

**PC #:** 325

**Public Concern:** The Final EIS should clarify why the Management Area 2B 24 inch dbh limit is not used in all Management 2 areas.

**Response:** Some prefer to increase the commercial quantity and quality of hardwood sawtimber. Others want hardwoods managed to reach larger diameters, maintaining at least 80% crown closure, and emphasizing the retention of more coarse woody debris in the woods. In order to resolve conflicting demands for its managed hardwood, the Forests developed two size class distribution tables for managed uneven-aged hardwoods (Tables 2-4 and 2-5 in the 2004 Forest Plan). Table 2-4 was developed to address the desire to increase the quantity and quality of hardwood sawtimber offered on the Forests while providing for closed canopy interior conditions (80% + crown closure). Table 2-5 was developed to address the desire to develop large blocks of closed canopy larger diameter interior hardwoods while providing some marketable products to the local communities. In both cases, guidelines were developed to address other immediate ecosystem needs such as the lack of large trees, snags, species diversity, etc.

Studies have shown that, to receive a 4% return, hardwoods would generally be harvested between 18-22 inches in diameter depending on the species. Most hardwood species would continue active growth beyond this 18-22 inch threshold, but the rate of return would drop below 4% and the risk of grade-reducing defects would increase. The Forests chose to use a 22-inch diameter (Table 2-4) to address economic concerns in several management areas. Under this scenario, even after the harvest there would be several trees per acre larger than 20 inches that would likely grow to diameters of 25" prior to the next harvest cycle. The Forests chose to use a 25-inch diameter (Table 2-5) to address ecological concerns in northern hardwood within MA 2B, 3B, 4B, and 6B. This scenario provides for more trees per acre larger than 20 inches. Both of these scenarios provide for continuous closed canopy of 80%+, which is a threshold used to maintain viability for several species of concern.

A total of 79,000 acres of MA 2B was added to the draft preferred alternative so that the Selected Alternative now provides for 209,000 acres of this management prescription.

**PC #: 691**

**Public Concern: The Forest Plan should not increase the amount of maple/basswood timber type.**

**Response:** As the respondent has suggested, the shift to maple/basswood has been a trend statewide over the last 30-40 years. Most of this shift is a result of natural succession on some of the State's better soil types where hardwoods are well suited. This trend will continue for some time as early successional species such as aspen, paper birch, balsam fir and jack pine give way to later successional species such as maple. On less fertile sites, natural conversion will be to white pine and oak.

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. While none of the alternatives prevent the shift to maple/basswood altogether, some maintain higher levels of early successional species while others utilize active management to accelerate the natural process of succession.

**PC #: 299**

**Public Concern: The Chequamegon-Nicolet National Forests should provide enough staff to prudently manage maturing, uneven-aged hardwood stands.**

**Response:** Staffing levels on the Chequamegon-Nicolet National Forests are part of an overall funding allocation determined by Congress and the Administration. We must work within the budget that is allocated. The Forests make requests for funding based on projected accomplishments in the 2004 Forest Plan.

## Even-aged Hardwoods

**PC #: 770**

**Public Concern: The Forest Plan should emphasize even-aged hardwood management in all early-successional communities.**

**Response:** Management Area 1 emphasizes early successional communities maintained through even-aged management. Aspen is the most prevalent tree species in Management Area 1A. Management Area 1B emphasizes aspen and conifer while Management Area 1C emphasizes aspen and hardwood. The northern hardwoods in Management Area 1 will be managed in a manner appropriate for the species and the capability of the site.



Opportunities for conversion from hardwood to aspen are expected to be explored in Management Area 1 areas to meet Forest Type Composition guidelines. However, standards and guidelines for trout stream management, best management practices for water quality, and visual objectives call for conversion from aspen to long-lived tree species and may offset these gains to the aspen species in some areas.

**PC #: 685**

**Public Concern: The Forest Plan should ensure that a full range of plants and animals will persist within the red oak forest type.**

**Response:** Management Areas 3B and 3C emphasize oak, oak-pine and oak-aspen forest types. Within MA 3B, some interior forest conditions will occur and a relatively continuous canopy will be found in some areas. In MA 3C areas, a mosaic of early- to mid-successional forest communities will occur. Within-stand species diversity will be moderate to high within these management areas. Long-lived conifers will be retained as reserve trees within aspen clearcuts and short-lived conifers will be reserved when long-lived species are absent. In addition, white pine and hemlock are emphasized in the transition zones between upland and lowland forest types. By maintaining diversity at both the stand- and landscape-level, lands allocated to MA 3B and 3C are expected to support plant and animal species that utilize red oak forest types.

**PC #: 324**

**Public Concern: The Forest Plan should address diversity issues by creating large northern hardwood interior forest blocks.**

**Response:** Alternatives addressed in detail in the FEIS provide varying amounts of interior northern forest blocks, mainly through allocation of MA2B. Acreage allocated to that management area ranges from 0 to 454,000 acres across all alternatives.

Changes were made between the preferred alternative (Alternative 5) in the draft documents and the Selected Alternative in the 2004 Forest Plan and FEIS. One change was the increase in emphasis on ecosystem restoration and specifically emphasis on interior northern hardwood conditions.

The requirements of mature forest adapted species will be better met by the Selected Alternative and 2004 Forest Plan than the 1986 Forest Plans for several reasons. First, the 2004 Forest Plan emphasizes large block management including two Northern Hardwood Interior Blocks that exceed 75,000 acres in size (Penokee and Alvin block), and four other blocks ranging in size from 26,700 acres to 48,400 acres. These blocks consist of contiguous areas designated as Management Areas 2B, 5 (Wilderness), 5B (Potential Wilderness Study Areas), and 6A (Semi-Primitive Non-motorized/low disturbance). Second, other MA 2B, 5, 5B, 6A and 8D (Candidate and Designated Wild/Scenic River Corridors) areas will increasingly provide habitat for mature forest dependent species as they age. Third, the 2004 Forest Plan emphasizes restoration of features that are characteristic of mature forest such as standing and downed logs and structural and compositional diversity. It is on these features that some of the mature forest specialist species depend. Lastly, Ecological Reference Areas (MA 8E, 8F and 8G) include old growth areas and will provide additional habitat to mature forest dependent species. Under the Selected Alternative, 185,000 acres are designated as MA 8E, 8F, and 8G whereas under Alternative 1 (No Action Alternative), only about 83,000 acres are designated as the equivalent of MA 8E, 8F, and 8G.



## Conifer

**PC #: 676**

**Public Concern: The Forest Plan should increase the amount of natural pine forest.**

**Response:** The Selected Alternative increases the amount of Management Area 4B (natural pine-oak) from 17,000 acres in Alternative 5 (the Preferred Alternative in the DEIS) to 30,000 acres. In addition, the 2004 Forest Plan increases the amount of Management Area 3B (natural oak-pine) from 1,700 acres in the Preferred Alternative to 10,900 acres.

**PC #: 677**

**Public Concern: The Chequamegon-Nicolet National Forests should manage 20 percent of natural white pine stands for uneven age.**

**Response:** Guidelines for management of white pine call for even-aged management through thinning, shelterwoods, and removal harvests. This does not rule out uneven-aged management of white pine. Decisions to manage white pine through uneven-aged prescriptions could be made following project level analysis.

Under the even-aged treatments prescribed for white pine, the shelterwood seed cut stage of even-aged treatments will be in place for 15 to 20 years with regeneration developing under the cover of the shelterwood. This will very much resemble an uneven-aged condition. Reserve trees at the time of the removal harvest will further add to the appearance of uneven-aged conditions.

**PC #: 424**

**Public Concern: The Forest Plan should maintain jack pine stands.**

**Response:** Species composition on the Forests was generated through the SPECTRUM model. SPECTRUM projections are based on the assumption that all early successional species, such as jack pine, will succeed to later successional species over time in areas where active timber management is prohibited. The model projects that approximately 5,300 acres of jack pine will convert to other species within 100 years. Jack pine decreases only slightly in management areas where active timber management is permitted; an approximate 6% loss (approximately 1,800 acres) after 100 years is expected. The Selected Alternative maintains 27,100+ acres of jack pine after 100 years of implementation of the 2004 Forest Plan, which is approximately 3,400 acres more than Alternative 5 (the Preferred Alternative in the DEIS).

Because the Forests recognize the value of jack pine habitats to bird species, the 2004 Forest Plan includes standards and guidelines to maintain and enhance some jack pine habitat for species such as the Connecticut warbler. Following the Species Viability Evaluation panels in spring 2002, modifications were made to Forestwide and Management Area-specific standards and guidelines to better accommodate the Connecticut warbler. Under the Selected Alternative and the 2004 Forest Plan, red pine-white pine and Pine Barrens have an increased emphasis when compared to the 1986 Plans. Young jack pine habitat—especially that provided by MA 4C (Surrogate Pine Barrens)—will provide highly suitable habitat for bird species that prefer the shrub layer characteristics typical of regenerating jack pine.

**PC #: 695**

**Public Concern: The Forest Plan should enhance boreal bird species habitat by maintaining a spruce/fir component within aspen stands.**

**Response:** The retention of long-lived conifers is a common theme among many of the management areas, including those that emphasize northern hardwoods (MA 2A, 2B, 2C, 3A, 3B, and 3C). The Selected Alternative and the 2004 Forest Plan recognize that the long-lived conifer component in transition zones between uplands and lowlands is extremely important and will strive to increase it (Objective 1.4j). Within management Area 1 (Early Successional Vegetation), longer-lived conifers will be reserved and, particularly in MA 1B, mixed aspen-conifer stands will be featured. In MA 1B areas, the retention of spruce, balsam fir and other conifers within aspen stands is emphasized. The retention of these species may enhance transitions to aspen-spruce-fir or aspen-mixed conifer stands. Within MA 1A and 1C, conifers will be retained as reserve trees within aspen clearcuts. Furthermore, in MA 2A and 2B, guidelines promote the retention of long-lived conifers within aspen clearcuts and short-lived conifers will be substituted when longer-lived species are absent.

**PC #: 418**

**Public Concern: The Forest Plan should maintain stands of balsam fir.**

**PC #: 436**

**Public Concern: The Chequamegon-Nicolet National Forests should discourage balsam fir as a conifer component in forest stands due to its susceptibility to spruce budworm outbreaks.**

**Response:** As pointed out by respondents, balsam fir is important for some wildlife species. Spruce budworm is a constant problem for balsam fir, especially with the older age classes. To help control the problem, the Forests have developed a desired age class distribution that will provide some protection from insect and disease agents that are attracted to older classes.

Through time, the Preferred Alternative (Alternative 5) projected a loss of balsam fir from 2.8% to 2.6% of the upland acres. The Selected Alternative projects a change from 2.8 to 2.7% of upland acres.

**PC #: 323**

**Public Concern: The Forest Plan should establish standards and guidelines that will protect white cedar dominated conifer swamps from excessive deer browsing.**

**Response:** The 2004 Forest Plan includes guidelines that prohibit harvesting of lowland conifers unless needed to maintain or enhance habitat for species of viability concern. Additional guidelines prohibit aspen management that would encourage beaver populations adjacent to northern white cedar stands. Northern white cedar is listed as a desirable species in the Desired Future Condition (DFC) for Riparian Ecosystem Habitats in Chapter 3 of the 2004 Forest Plan. The protection of northern white cedar from deer browsing was considered in the allocation of management areas. Efforts were made to limit the emphasis on early successional forest types adjacent to forested lowlands.

**PC #: 686**

**Public Concern: The Chequamegon-Nicolet National Forests should make red pine plantations more suitable for birds.**

**Response:** The 2004 Forest Plan includes a guideline to consider silvicultural treatments such as shelterwood harvest patches, scarification, and underplanting in order to increase within-stand diversity in red pine stands. These activities would encourage future mast, den, or nest trees and would occur in no more than 5% of the stand. Increases in stand diversity through understory development is likely to make red pine stands more desirable to some bird species such as the magnolia warbler and the black-throated blue warbler.

**PC #: 40**

**Public Concern: The Forest Plan should mix long-lived conifers with hardwoods, especially in upland/lowland transition zones.**

**Response:** The respondent suggests that a change is needed in the Forestwide guideline that calls for excluding long-lived conifer dominated transition zones from harvest areas, unless treatment would provide an opportunity to enhance the conifer component. The guideline in question was not included in the 2004 Forest Plan.

**PC #: 664**

**Public Concern: The Forest Plan should establish more 4B management areas to protect the pine warbler.**

**Response:** In the development of the Selected Alternative from Alternative 5, additional MA 4B areas were added to the Park Falls Ranger District (RD), Eagle River/Florence RD, and the Lakewood/Laona RD. These additions total approximately 13,800 acres, bringing the total MA 4B allocation under the Selected Alternative to about 30,000 acres. Excluding Alternative 1, which places no emphasis on MA 4B, the remaining alternatives range from 16,600 acres to 64,700 acres of MA 4B.

## Old Growth

**PC #: 783**

**Public Concern: The Chequamegon-Nicolet National Forests should acquire old growth stands currently within Wisconsin State Trust Lands.**

**Response:** The purchase of lands by the Chequamegon-Nicolet National Forests is generally done on a site-specific basis and is not an area of consideration in the plan revision process. Priorities for land acquisitions can be found in Chapter 2 (Standards and Guidelines) of the 2004 Forest Plan.

**PC #: 386**

**Public Concern: The Forest Plan should set aside several 50,000 acre sites as biological reserves.**

**Response:** Rather than biological reserves, an integrated management approach has been used to design alternatives addressed in detail in the FEIS. Components of this approach include: 1) allocation of management areas that emphasize ecosystem restoration (MA 2B, 3B, 4B, 4C); 2) allocation of management areas such that interior forest conditions are created in concert with Wilderness and other non-motorized areas; and 3) designation of RNAs, candidate RNA's, Special Management Areas, and Old Growth and Natural Feature complexes based on field inventories and evaluation by Forest specialists. The latter provide ecological reference for current and future management as well as refugia

for some rare species. Alternatives described in detail provide varying emphasis on ecosystem restoration, including landscape pattern (See Chapter 2 of the FEIS for more detail).

National Forests are managed to provide uses of all the various renewable surface resources in a combination that best meets the needs of the American people. In the case of the 2004 Forest Plan, this means providing a balance among competing concerns while managing for biological diversity, off-road vehicles, timber harvest, and non-motorized recreation. Use of the integrated management approach better fits that balance.

**PC #: 401**

**Public Concern: The Chequamegon-Nicolet National Forests should surround Board of Commissioners of Public Lands areas with mature forests.**

**Response:** In response to public comments and internal review, the Forests determined that more Alternative Management Areas (AMAs) were needed in the 2004 Forest Plan than provided by the Proposed Forest Plan. The alternative offered by the Board of Commissioners of Public Lands (BCPL) was considered. However, the additional AMAs were chosen based on their 1) overlap with MA 8E, 8F and 8G areas, 2) vegetation composition and landscape-scale structure, 3) rank in the Landscape Analysis and Design (LAD) Inventory, 4) presence of inventoried sensitive species, and 5) amenability to community restoration. A total of 79,000 acres were added to MA 2B, 9,000 acres to MA 3B, and 13,000 acres to MA 4B in response to public comments. MA 2B allocation in the Selected Alternative provides three northern hardwood core blocks larger than 40,000 acres while the BCPL proposal was estimated to provide two.

**C #: 16**

**Public Concern: The Forest Plan should restore old growth habitat to protect old growth dependent species.**

**Response:** Frelich and Lorimer (1991) suggest that forty to sixty-eight percent of the Lakes States forests were in an old growth condition in the years before European settlement. Forty to 68% of the *forested* acres (excludes brushy lowlands, barrens, meadows or otherwise perennially open areas) on the Chequamegon-Nicolet National Forest is approximately 900,000 to 530,000 acres of land. The *Analysis of Management Situation: Old Growth Forests* states that "alternatives should explore the effects of old growth acreages at perhaps one-half and one third of the lower historic limit." One third to one half of the lower limit yields a range from 177,000 acres to 265,000 acres of old growth forest on the Chequamegon-Nicolet National Forest. All of the alternatives, with the exception of Alternative 1, allocate amounts within this range to management areas that provide or have the potential to provide old growth conditions (MA 5, 5B, 6A, 8D, 8E, 8F, 8G). Allocation to these management areas ranges from 232,000 to 324,000 forested acres. Alternative 1 provides only 141,000 acres of old growth or developing old growth.

**PC #: 390**

**Public Concern: The Forest Plan should increase its management goal of 25 percent old growth along the two national scenic trail corridors to at least 50 percent.**

**Response:** A variety of vegetative types and management activities occur along the National Scenic Trails. The Forests have guidelines that restrict timber harvest operations near the trails. They include no temporary openings within 200 feet of the trail, all slash cleared within 10 feet of the trail, and all slash cut to within 24 inches of the ground

further from the trails. These are found in Chapter 2 of the 2004 Forest Plan in the Scenery Management Section. Effects of management area allocation, including that of old growth on all alternatives is included in Chapter 3 of the FEIS.

**PC #: 337**

**Public Concern: The Chequamegon-Nicolet National Forests should protect old growth stands by designating them Ecosystem Reference Areas, permanently excluded from logging and salvage operations.**

**Response:** Management Area 8G guidelines prohibit timber salvage except in the following situations: 1) there is a threat to human life, Old Growth resources or structures, 2) there is a threat to adjacent lands, or 3) the area no longer retains the characteristics for which it was designated. 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.” This means that the National Forests will be managed to provide for the use of all the various renewable surface resources in a combination that best meets the needs of the American people. The 2004 Forest Plan provides a balance between competing concerns—such as logging operations and protection of Old Growth—while managing for biological diversity, off road vehicles, timber harvest, and non-motorized recreation. In the opinion of the Forests’ managers, the 2004 Forest Plan best meets the needs of the diverse public at local, state, and national scales.

**PC #: 338**

**Public Concern: The Forest Plan should protect all existing old growth, including within stand inclusions of less than ten acres.**

**Response:** The 2004 Forest Plan allocates approximately 185,000 acres to Ecological Reference Areas (MA 8 E, 8F, and 8G). This is an increase of 102,000 acres over the 1986 Forest Plans. The majority of known old growth areas on the Forests are included in these designations. In the development of the Selected Alternative from Alternative 5, over 102,000 acres of Alternative Management Areas (AMAs; MA 2B, 3B, 4B and 4C) were added. These additional AMAs were chosen, in part, based on their overlap with MA 8E, 8F and 8G areas. Thus, many old growth remnants and previously un-logged areas will be embedded in an Alternative Management Area. Additionally, forestwide and management area standards and guidelines can offer some protection to existing old growth areas, not designated as MA 8E, 8F or 8G. For example, hemlock is reserved in most cases and reserve tree guidelines focus on the largest trees available (Chapter 2 of the 2004 Forest Plan).

**PC #: 357**

**Public Concern: The Forest Plan should establish a compatible landscape context for old growth areas in the alternative management area designation.**

**PC #: 384**

**Public Concern: The Forest Plan should improve the connectivity between old growth stands.**

**Response:** The 2004 Forest Plan will allocate approximately 185,000 acres of ecological reference areas (MA 8 E, 8F, and 8G), or 96% of the acreage identified in the forestwide inventory of ecologically significant features (see LAD report, Parker 2000). Of this, 85,500 acres, or 91% of all proposed MA 8G acres identified through field survey and analysis as part of the Landscape Analysis and Design (LAD) process, are allocated to Old Growth & Natural Features Complexes (MA 8G).

In the development of the Selected Alternative from Alternative 5, over 102,000 acres of Alternative Management Areas (AMAs; MA 2B, 3B, 4B and 4C) were added. This brings the total acreage of AMAs to 263,300 acres, which is approximately 18% of the total Forest land base. Under Alternative 5, approximately 11% of the land base was designated as AMA. The additional AMAs were chosen based on their: 1) overlap with MA 8E, 8F and 8G areas, 2) vegetation composition and landscape-scale structure, 3) rank in the Landscape Analysis and Design Inventory, 4) presence of inventoried sensitive species, and 5) amenability to community restoration.

To improve connectivity for those species associated with mature, northern hardwood-hemlock forest, the 2004 Forest Plan provides 3 large (greater than 20,000 acres) northern hardwood core areas (MA 2B, 5, 5B, or 6A) which are at least 20 miles long. In addition, there are 6 such areas that are northern hardwood-dominated. Four of these corridors are on the Chequamegon land base of the Forests and two are on the Nicolet. See the “Landscape Connectivity Maps” in Appendix P of this document and the “Landscape Pattern” section of Chapter 3 of the FEIS for more information.

**PC #: 683**

**Public Concern: The Forest Plan should allow 40,000 to 50,000 acres of early-successional forest to succeed naturally to late-successional forest.**

**Response:** Forest succession is a natural process that requires time (decades or centuries). Under the Selected Alternative, approximately 6,200 acres of early successional forest (aspen) are projected to succeed to late successional forest over the first decade of plan implementation. If the 2004 Forest Plan is implemented through the end of the second decade, 13,000 acres of early successional forest will have succeeded to late successional forest. By the seventh and eighth decade under the 2004 Forest Plan, early successional forest is projected to decrease by 45,000 and 57,000 acres, respectively.

**PC #: 406**

**Public Concern: The Forest Plan should count the designated acreage of special management areas toward old growth requirements.**

**Response:** The Old Growth effects section has been revised in the FEIS to better respond to this concern. Because they significantly contribute to old growth objectives, Special Management Areas (MA 8F) and Research Natural Areas (MA 8E) are considered in the analysis of old growth along with Old Growth and Natural Feature Complexes (MA 8G) (Chapter 3 of Forest Plan). Other management areas, such as MA 5, 5B, 6A, and 8D, may also contribute to old growth objectives and so are often referred to as “developing old growth” in the FEIS. Because of the limited human impacts in these management areas, conditions are expected to progress toward those representing old growth communities. Alternatives 2-9 designate between 18% and 25% of the forested land on the Chequamegon-Nicolet National Forest as old growth or developing old growth areas. The Selected Alternative is within this range with 287,300 acres (19% of land base) of old growth/developing old growth.

**PC #: 693**

**Public Concern: The Forest Plan should set aside 30 percent of the forest as large blocks of hardwood interior forest.**

**Response:** Interior hardwood forest (MA 2B) receives a much greater emphasis (209,000 acres) under the Selected Alternative than under the 1986 Forest Plans (no emphasis). Under the Selected Alternative, interior hardwood forest accounts for 14% of the Forests.



Approximately 30% of the Forests' land base would be allocated to interior hardwood forest in Alternative 3. The remaining alternatives, excluding Alternative 1, propose allocating between 2% and 19% of the Forests to interior hardwood forest.

## Non-Native Invasive Species

**PC #: 439**

**Public Concern: The Chequamegon-Nicolet National Forests should aggressively address invasive species, and the means by which they are introduced.**

**Response:** Standards and Guidelines (Chapter 2) in the 2004 Forest Plan provide direction for reducing the spread of noxious weeds and non-native invasive species. These protections would be considered during the project-level decision-making process.

## Forest Transportation System General (Infrastructure)

**PC #: 77**

**Public Concern: The Chequamegon-Nicolet National Forests should not build new roads.**

**PC #: 753**

**Public Concern: The Forest Plan should not upgrade the traffic service level of roads.**

**Response:** The Chequamegon-Nicolet National Forests have established a road density goal of 3.0 miles per square mile. To achieve this goal, some roads may be decommissioned or closed. Road building is needed at times to support public and administrative use of National Forest System lands. Road building and/or decommissioning, upgrading, or closing is determined during the site-specific project level decision process.

**PC #: 714**

**Public Concern: The Forest Plan should clarify forestwide standards and guidelines for Transportation Systems.**

**PC #: 716**

**Public Concern: The Forest Plan should clarify the standards and guidelines for Transportation Planning.**

**PC #: 720**

**Public Concern: The Forest Plan should clarify the standards and guidelines for Road Design, Construction, Reconstruction, and Maintenance.**

**PC #: 721**

**Public Concern: The Forest Plan should clarify the standards and guidelines for Road Decommissioning and Landscape Restoration.**

**Response:** Forestwide standards and guidelines were developed based input from an interdisciplinary team consisting of resource specialists from a wide range of disciplines. Forestwide standards and guidelines such as those referred to by the respondent are listed in Chapter 2 of the 2004 Forest Plan. Based on public comments, consultation with government representatives, and internal review, many of the forestwide standards and guidelines were revised and reworded in order to clarify meaning, eliminate redundancies, and provide flexibility for project-level decision-makers. The standards



and guidelines included in the 2004 Forest Plan are permissive, meaning that they outline the required course of action but do not specify how the action will be accomplished. Including more prescriptive language, such as that suggested by the respondent, would make it difficult for the Forests' managers to apply the Forest Plan to site-specific conditions.

**PC #: 717**

**Public Concern: The Chequamegon-Nicolet National Forests should move road density guidelines from the Social-Recreation Programs section to the Transportation Planning section in Transportation Systems.**

**Response:** Forestwide standards and guidelines underwent intensive review between the draft and final versions of the Forest Plan. Based on comments received, internal review, and government consultations, the open and total road density upper limits described in the public concern have been incorporated by reference into Objective 3.1 for Capital Infrastructure, which calls for reducing average open and total road density on the Forests. Appendix BB, the "Guide to Reducing Total and Open Road Density" will be used to focus efforts. Because the road density upper limits specifically describe measurable results or desired conditions, they are written as goals or objectives rather than guidelines. Standards and guidelines specific to transportation systems in each MA are provided in Chapter 3 of the 2004 Forest Plan.

**PC #: 722**

**Public Concern: The Forest Plan should replace the Transportation System standard for Management Area 5B with a guideline that closes and decommissions roads and enhances the wilderness characteristics of the area.**

**Response:** Forestwide goals and objectives (Goal 3.1, Capital Infrastructure; Chapter 1 of the 2004 Forest Plan) and forestwide standards and guidelines (Chapter 2 of the 2004 Forest Plan, Road Decommissioning and Landscape Restoration) provide adequate direction for the decommissioning of roads in Management Area 5B and other Management Areas. Since this information is covered in forestwide goals, objectives, standards, and guidelines, including more specific language in the management area-specific standards and guidelines, as suggested by the respondent, is unnecessary. The standards and guidelines for Transportation Systems in Management Area 5B provide enough direction and flexibility to ensure that motorized use in recommended Wilderness study areas will be consistent with the unique characteristics for which the areas were established.

**PC #: 723**

**Public Concern: The Forest Plan should modify the Transportation System standards and guidelines for Management Area 6A.**

**PC #: 729**

**Public Concern: The Forest Plan should modify the Transportation System standards and guidelines for Management Area 8D.**

**PC #: 732**

**Public Concern: The Forest Plan should modify the Transportation System standards and guidelines for Management Area 8G.**

**PC #: 724**

**Public Concern: The Forest Plan should modify the Transportation System standards and guidelines for Management Area 6B.**

**PC #: 728**

**Public Concern: The Forest Plan should modify the Transportation System standards and guidelines for Management Area 8C.**

**PC #: 730**

**Public Concern: The Forest Plan should modify the Transportation System standards and guidelines for Management Area 8E.**

**PC #: 731**

**Public Concern: The Forest Plan should modify the Transportation System standards and guidelines for Management Area 8F.**

**Response:** The standards and guidelines for each of the management areas were developed using input from an interdisciplinary team consisting of resource specialists from a wide range of disciplines. Based on public comments, consultation with government representatives, and internal review, the standards and guidelines were reviewed and revised between the draft and final versions of the 2004 Forest Plan in order to clarify meaning, eliminate redundancies, and provide much-needed flexibility for project-level decision-makers. The standards and guidelines are deliberately permissive in order to give forest managers flexibility to adjust to site-specific conditions. On a whole, forest planners avoided prescriptive language such as that suggested by the respondent so that project-level decision-makers will better be able to apply the 2004 Forest Plan in on-the-ground resource management situations. Chapter 3 of the 2004 Forest Plan contains the revised standards and guidelines for the management areas.

## Roads Infrastructure Management

**PC #: 748**

**Public Concern: The Forest Plan should provide access to existing and future gravel and sand sources for the state, counties, and towns.**

**Response:** Access to existing and future gravel and sand sources by the State, Counties, and Towns will remain the same as under the 1986 Forest Plans. According to USDA-Forest Service regulations, “Forest Service policy is to make mineral materials on National Forest lands available to the public and to local, state, and Federal government agencies where reasonable protection of, or mitigation of effects on, other resources is assured, and where removal is not prohibited” (36 CFR 228, 228.43 (a)).

Some Management Areas do not allow mineral extraction. However, the Chequamegon-Nicolet National Forests has determined that the CNNF can still continue to meet its obligation as stated above over the next 10 years.

**PC #: 78**

**Public Concern: The Forest Plan should set speed limits for logging trucks.**

**Response:** Safety concerns associated with dual-use on roads or trails is a decision that will be made at the site-specific project level. Timber sale contracts may also contain provisions such as prohibiting use of trucks and machinery during certain times of the year, and posting caution signs for other motorized users.

**PC #: 79**

**Public Concern: The Forest Plan should require plowing snow-covered logging access roads.**

**Response:** Plowing roads used by logging vehicles would be a site-specific project level decision. The 2004 Forest Plan is a programmatic document as opposed to a project level or site-specific document.

**PC #: 744**

**Public Concern: The Chequamegon-Nicolet National Forests should keep the current road system in place until an accurate road inventory is completed.**

**Response:** Current road inventories are more accurate than at any time in the past, allowing for more precise estimates of road miles and density (see the “Transportation and Open Road Density” section of the FEIS for more details). This information has given the Forests the information needed to estimate miles of roads across the Forests that will need to be decommissioned in order to reduce average forestwide total road density to 3.0 mi./sq. mi.—a road density more compatible with the Forests’ long-term management objectives and the desired future condition for the landscape than the current condition. Maps of the Forests’ current transportation system have been created and are in the planning record.

**PC #: 745**

**Public Concern: The Final EIS should develop a reasonable definition of a road for use in a new roads inventory.**

**Response:** The definition of a road as “a motor vehicle travelway over 50 inches wide, unless designated and managed as a trail” was codified by 36 CFR 212.1. To develop another definition is not within the authority of the CNNF. Although a 50”-wide road may be too narrow to allow passage by larger vehicles such as full-sized pick-up trucks, it is still an artificial corridor on the landscape that allows passage by motorized vehicles, including possible illegal use by All Terrain Vehicles or other Off-Road Vehicles.

**PC #: 747**

**Public Concern: The Final EIS should provide maps of each road inventory performed to date.**

**Response:** Maps of the CNNF’s most recent road inventory have been created and are in the planning record. The initial development of the most recent road inventory began in the late 1990s with a comprehensive inventory of all roads—classified, unclassified, and temporary—on the Forests. For financial and ecological reasons it was necessary for the Forests to conduct as thorough a roads inventory as possible in order to determine the extent of the existing roads network. Using the conservative definition of a road as “a motor vehicle travelway over 50 inches wide (36 CFR 212.1)” allowed the Forest Service to inventory all travelways on the Forests that could possibly allow passage of motorized vehicles.

## **Road Densities**

**PC #: 755**

**Public Concern: The Final EIS should clarify how road densities will be calculated.**

**Response:** The Recreation Opportunity Spectrum (ROS) classification system was used to apply road density upper limits to the different parts of the Forests. Meeting the road

density objectives will help the Forests achieve an average forestwide total road density of 3.0 mi/sq mi. This desired road density is a forestwide average, meaning that some parts of the Forests will have a road density that is less than the forestwide average, while other areas may have a greater density. Forest specialists have attempted to clarify the description of the road density classification system in the 2004 Forest Plan and FEIS. See Chapter 3 of the FEIS, "Transportation and Open Road Density" for more information.

**PC #: 738**

**Public Concern: The Forest Plan should reduce road densities to three miles per square mile.**

**Response:** Like the 1986 Forest Plans, the 2004 Forest Plan and EIS call for an average forestwide total road density of 3.0 mi/sq. mi.

**PC #: 593**

**Public Concern: The Chequamegon-Nicolet National Forests should designate greater portions of the forest as low road density areas to protect habitat for wildlife sensitive to human disturbance.**

**Response:** Open road density limits are intended to place priority on road closures. They are not a goal for road construction. In addition, there is variation in the definition of a "road." For instance, the Wisconsin Wolf Recovery Plan defines a road as one that 2-wheel-drive vehicles may travel. This definition fits the description of Forest Service Maintenance Level 3-5 roads. The Wolf Recovery Plan calls for a road density of 1.0 mi/mi<sup>2</sup> or less in order for an area to be considered wolf habitat. The average total road density of Maintenance Level 3-5 roads on the Forests is 1.0 mi/mi<sup>2</sup>.

The 2004 Forest Plan calls for an overall average total road density of 3.0 mi/mi<sup>2</sup> for Maintenance Level 1-5 roads, including those too rugged for travel by 2-wheel drive vehicles or those closed to public use. Existing total road density on the Forests is 3.9 mi/mi<sup>2</sup>. Therefore, there will be a Forestwide decrease in total road density under the 2004 Forest Plan. Other species sensitive to human disturbance, like the American marten, are also likely to benefit from maintaining or reducing currently low road densities in some areas of the Forests.

**PC #: 111**

**Public Concern: The Chequamegon-Nicolet National Forests should reduce road density.**

**Response:** One of the goals of the revised Forest Plan is to reduce road density on the Forests. Goal 3.1 – Capital Infrastructure (Chapter 1 of the 2004 Forest Plan) calls for progressing toward a forestwide average total road density of 3.0 mi/sq mi. Since the average total road density for the Forests is currently estimated as 3.9 mi/sq mi, achieving the forestwide total road density goal will require a 2% (Chequamegon) to 39% (Nicolet) reduction in overall road miles on the Forests.

**PC #: 490**

**Public Concern: The Forest Plan should set the road density in semi-primitive motorized and roaded natural remote areas at four miles per square mile.**

**Response:** The Forest Service's Recreation Opportunity Spectrum Handbook was used to zone recreation opportunities on the Forests. The classification Semi-Primitive Motorized (SPM) has been applied to predominantly natural-appearing settings where the visitor has a moderate probability of experiencing isolation and a good chance of encountering

primitive roads and motorized use. Roaded Natural Remote (RNR) areas will provide the same type of experience but on a smaller scale. Based on the desired future condition of the landscape, it was determined that an open road density of 2.0 mi/sq mi would provide adequate access for forest product gathering, hunting, and dispersed recreation while maintaining and enhancing desired characteristics in SPM and RNR settings. A road density of 4.0 mi/sq mi was determined to be incompatible with the characteristics of these areas and the resource management objectives of the 2004 Forest Plan and planning alternatives.

**PC #: 528**

**Public Concern: The Forest Plan should protect species that require large remote areas by restricting motorized use.**

**PC #: 752**

**Public Concern: The Forest Plan should not increase road density levels in areas currently supporting active wolf packs.**

**PC #: 742**

**Public Concern: The Forest Plan should not reduce road density for the sake of wolf habitat.**

**Response:** Open road density limits are intended to place priority on road closures. They are not a goal for road construction. The 2004 Forest Plan calls for an overall average total road density of 3.0 mi/mi<sup>2</sup> for all Maintenance Level 1-5 roads on the Forests. Existing total road density forestwide is 3.9 mi/mi<sup>2</sup>. Therefore, there will be a decrease in total road density under the 2004 Forest Plan. Guidelines in the 2004 Forest Plan ensure that existing open road densities will not be exceeded within active wolf territories and that existing roads within active wolf territories or high probability wolf habitat (PI >50) will not be upgraded beyond their existing Maintenance Level. Furthermore, the 2004 Forest Plan assumes that a reduction in open road density from the existing condition would improve the recreational experience of people seeking solitude and remote recreational experiences, would improve habitat quality for species (such as the gray wolf and American marten) sensitive to open road density and associated human activity, and would help to limit the spread of non-native invasive species on the Forests.

**PC #: 733**

**Public Concern: The Forest Plan should limit the road density of the area east of the Headwaters Wilderness to two miles per square mile.**

**Response:** Maximum open road density in the area east of the Headwaters Wilderness (Polygon 34 and part of Polygon 39, the North Branch Popple River corridor) is limited to 2.0 mi/sq mi or lower in all alternatives, including the Selected Alternative.

**PC #: 734**

**Public Concern: The Forest Plan should limit the road density in the Foulds Creek Block to two miles per square mile.**

**Response:** Maximum open road density in the Foulds Creek Block (Chequamegon Polygon 76 eastern edge of Polygon 114) is limited to 2.0 mi/sq mi or lower in all alternatives, including the Selected Alternative.

**PC #: 736**

**Public Concern: The Forest Plan should limit the road density in the Kidrick Swamp Area to two miles per square mile.**

**Response:** Open road density zones included on maps in the FEIS map set are not meant to be goals. Instead they assist in focusing road closure efforts. Maximum open road density in much of the Kidrick Swamp Area (Chequamegon Polygon 94 and part of polygons 96, 87, and 105) is limited to 2.0 mi/sq mi or lower in the 2004 Forest Plan and the action alternatives considered in the FEIS. Desired future conditions for the remaining portions of Polygons 96 and 105 made a maximum open road density of 4.0 mi/sq mi the most appropriate in all alternatives.

**PC #: 750**

**Public Concern: The Forest Plan should limit the road density in the headwaters region of the Popple River and north to the Pine River corridor to two miles per square mile.**

**Response:** Maximum open road density in much of the headwaters region of the Popple River and north to the Pine River Corridor is limited to 2.0 mi/sq mi or lower in the 2004 Forest Plan and the alternatives considered in the FEIS. Only Polygon 41 has been assigned a maximum road density of 4.0 mi/sq mi in Alternatives 2-9 and the Selected Alternative.

**PC #: 751**

**Public Concern: The Forest Plan should extend the McCaslin Mountain low road density area to include the Carter Hills area.**

**Response:** The CNNF assigned road density objectives to different parts of the Forests based on the desired future condition for the landscape. Based on this analysis, a maximum open road density of 4.0 mi/sq mi was determined to be the most appropriate for the Carter Hills area (part of Nicolet Polygons 63 and 69).

**PC #: 754**

**Public Concern: The Forest Plan should limit the road density in the 2B Management Area south of the Pine River Corridor to two miles per square mile.**

**Response:** Maximum open road density in the Management Area south of the Pine River corridor (Nicolet Polygon 29) is limited to 2.0 mi/sq mi or lower in the 2004 Forest Plan and EIS.

**PC #: 759**

**Public Concern: The Forest Plan should limit the road density in the Hellhole Creek Block to two miles per square mile.**

**Response:** Maximum open road density in the Hellhole Creek Block (Chequamegon Polygons 38 and 43) is limited to 2.0 mi/sq mi or lower in the 2004 Forest Plan and EIS.

**PC #: 737**

**Public Concern: The Forest Plan should limit the road density in the Hay Lake Area to two miles per square mile.**

**Response:** The CNNF assigned road density upper limits to different parts of the Forests based on the desired future condition for the landscape. Based on this analysis, an open road density upper limit of 4.0 mi/sq mi was determined to be the most appropriate limit for the Hay Lake area in the Park Falls Ranger District.

**PC #: 749**

**Public Concern:** The Forest Plan should limit the road density in the area east of the Whisker Lake Wilderness to two miles per square mile.

**Response:** The area east of the Whisker Lake Wilderness is outside the boundaries of the National Forest and so is outside the scope of this Plan.

## Road Decommissioning

**PC #: 760**

**Public Concern:** The Forest Plan should designate Forest Road 387 for decommissioning.

**Response:** A decision to decommission a specific Forest Road would be done at the site-specific project level using guidance established in the 2004 Forest Plan.

**PC #: 740**

**Public Concern:** The Forest Plan should mandate road decommissioning at a rate comparable to road construction.

**Response:** The 2004 Forest Plan includes a goal (#3.1) to progress toward the forestwide road density of 3.0 mi/mi<sup>2</sup>.

**PC #: 594**

**Public Concern:** The Forest Plan should mandate decommissioning for roads identified as unclassified.

**Response:** Forest policy requires a Roads Analysis for any project-level road management decision. One outcome of the analysis may be the recommendation that roads—both classified and unclassified— should be decommissioned in order to focus limited maintenance funds on fewer corridors and to reach desired conditions for recreation experiences and ecological needs.

**PC #: 727**

**Public Concern:** The Forest Plan should not mandate decommissioning of low-level or uninventoried roads.

**Response:** The “Guide for Reducing Open and Total Road Density” (Appendix BB of the 2004 Forest Plan) lists open road densities up to 2.0 miles/square miles as suitable for Semi-Primitive Motorized and Roaded Natural Remote Areas (see Map Set). This means both motorized and non-motorized recreational use could occur in these areas.

The CNNF believes that this allocation best meets the needs of the diverse American public and achieves a balance between competing resource concerns while managing for biological diversity, off-road vehicles, timber harvest and non-motorized recreation.

**PC #: 756**

**Public Concern:** The Chequamegon-Nicolet National Forests should clarify how serious an environmental problem must be to close a road without public input.

**Response:** In some cases, it is necessary to temporarily close a road when it presents an imminent threat to the environment, wildlife or public safety. This is done by the issuance of a Forest Supervisor Closure Order. Reasons for the closure are listed on the order. Other road closure decisions may take place at the site-specific project level, where



public involvement is solicited. It is at the project level that long-term, seasonal, or temporary road closures will be decided.

**PC #: 108**

**Public Concern: The Forest Plan should require the decommissioning of logging roads upon project completion.**

**Response:** Decisions on whether or not to close or decommission a road are made at the site-specific project level. Forestwide Standards and Guidelines (Chapter 2) and Management Area Prescriptions (Chapter 3) in the 2004 Forest Plan provide direction on road closures and decommissioning.

## Trails Infrastructure Management

**PC #: 80**

**Public Concern: The Forest Plan should allow ATV use on the trail from Wolf Runner Motel to Old 64 (Town Road).**

**Response:** A decision to establish a specific ATV trail would be done at the site-specific project level using guidance established in the 2004 Forest Plan.

## Recreation Management

**PC #: 670**

**Public Concern: The Chequamegon-Nicolet National Forests should develop a recreation program that provides diverse opportunities.**

**PC #: 470**

**Public Concern: The Forest Plan should provide for development of more recreation infrastructure.**

**PC #: 503**

**Public Concern: The Forest Plan should not change current recreation access policies.**

**PC #: 84**

**Public Concern: The Forest Plan should emphasize outdoor recreation over resource extraction.**

**PC #: 106**

**Public Concern: The Forest Plan should provide equal access to all forms of recreation.**

**Response:** The Multiple-Use Sustained-Yield Act of 1960 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.” In the case of the 2004 Forest Plan, that means providing a balance between competing concerns while managing for biological diversity, off-road vehicles, timber harvest, and non-motorized recreation. The 2004 Forest Plan meets the needs of the diverse American public by achieving a balance between competing resource uses.

**PC #: 561**

**Public Concern: The Forest Plan should provide for ATV clubs to assume incentive-based responsibility for maintenance of motorized trails.**

**Response:** The Chequamegon-Nicolet National Forests receive funding for trail maintenance from state ATV and snowmobile registration. It is possible for ATV clubs, through a Memorandum of Understanding or a Special Use Permit, to be able to manage a trail or segment of a trail. Specific agreements, conditions, types of bonds, or stipulations could be developed at the site-specific project level, requiring the permittee to be responsible for certain types of trail maintenance.

## User Conflicts

**PC #: 86**

**Public Concern: The Forest Plan should limit OHV access to prevent user conflicts.**

**Response:** A wide range of non-motorized areas were allocated, as well as varying treatment of OHV access was included across alternatives addressed in detail. The Selected Alternative and 2004 Forest Plan moves towards reducing conflict between Off-Highway Vehicles (OHVs) and non-motorized users of the Forests. In the Selected Alternative, ATVs are not permitted off designated roads or trails. In addition the one designated ATV play area (known as Open 26) on the Washburn Unit of the Forests will be closed. Some new ATV trails and road routes on the Nicolet side of the Forests will be provided. These steps were taken to better regulate ATV opportunities on the Forests while helping to reduce conflicts between the motorized users and non-motorized users.

**PC #: 768**

**Public Concern: The Final EIS should address and mitigate the growing conflicts between ATV use, mountain biking, and hiking.**

**Response:** The Forests have approached the motorized/non-motorized recreation conflict by limiting motorized use and by zoning the Forests to separate motorized and non-motorized uses. Specific actions listed in the 2004 Forest Plan include: 1) limiting ATV use to designated trails and roads; 2) recommending more areas (wilderness, SPNM, and non-motorized with full vegetative management) where motorized access is not permitted; and 3) reducing the total miles of roads on the Forests. These actions will help to separate recreation users based on their preference for motorized or non-motorized recreation.

**PC #: 489**

**Public Concern: The Forest Plan should prohibit joint use of trails.**

**Response:** All designated ATV trails on the Forests have been and will continue to be designed and built for that motorized use. These trails are not designated for other uses such as biking or horseback riding, although those uses are not prohibited. The Forests have many miles of hiking, biking, and horse trails that are closed to motorized uses. The Forests intend to continue designing and constructing trails as described above to make it as easy as possible for motorized and non-motorized users to avoid conflicts with each other.

**PC #: 625**

**Public Concern: The Forest Plan should designate existing and proposed trails for multiple uses.**

**Response:** The Forest Service supports multiple use of trails. Most ATV trails on the Forests are also snowmobile trails in the winter. Similarly, many cross country ski trails are used as hiking and biking trails in the summer. Most motorized trails are also open to a variety of non-motorized uses. Most non-motorized trails, however, are not open to motorized uses because the trail tread itself is not designed for motorized recreation vehicles and because the trail users are often pursuing a quiet, non-motorized experience.

**PC #: 521**

**Public Concern: The Forest Plan should prohibit ATV and snowmobile use adjacent to private property.**

**Response:** Guidelines in the 2004 Forest Plan only permit use of ATVs on designated and posted trails/road routes. New trail designations take place at site-specific project-level planning. Project level decisions are subject to the National Environmental Policy Act (NEPA) requirements, and public involvement is part of that process. Individuals who own land near the Forests can become aware of upcoming recreation projects on the Chequamegon-Nicolet by obtaining the NEPA newsletter (Schedule of Proposed Actions), which is issued quarterly. It can also be found on the Chequamegon-Nicolet National Forests website at: <http://www.fs.fed.us/r9/cnnf/natres/nepaqtr/index.html>

## Recreation Types/Opportunities

### Motorized Recreation

**PC #: 110**

**Public Concern: The Forest Plan should emphasize expansion of the motorized trail system.**

**PC #: 506**

**Public Concern: The Forest Plan should not impose new limits on ATV use.**

**PC #: 569**

**Public Concern: The Forest Plan should permit ATV use on logging roads.**

**PC #: 109**

**Public Concern: The Chequamegon-Nicolet National Forests should convert existing forest roads to trails.**

**Response:** An alternative that provided opportunities for off-road, off-trail use was considered but eliminated from additional study. Over the years, ATV use on the Chequamegon landbase under the 1986 Forest Plan has become more limited as Forest Supervisor Law Enforcement orders were established to restrict ATV users to designated trails and roads in areas where resource damage had occurred. As ATV use continues to increase on the Forests, we expect that continued off-road, off-trail use would lead to unacceptable resource damage and additional area restrictions. This potential for damage due to off-trail use would be exacerbated as progressive closures would lead to less and less areas open to off-road or off-trail use, concentrating such use in the areas remaining open.

The 2004 Forest Plan increases the opportunities for trail and road riding on the Chequamegon side of the Forests and provides some additional opportunities on the

Nicolet. Snowmobiling will continue to be permitted on signed trails and unplowed roads.

**PC #: 638**

**Public Concern: The Chequamegon-Nicolet National Forests should construct spurs along main trails.**

**Response:** Road and trail constructions, closures, etc., will be decided during site specific project level analysis. Public participation will be solicited before such decisions are made.

**PC #: 541**

**Public Concern: The Forest Plan should include provisions for further motorized trail additions and relocations to meet unanticipated demands during the 15-year plan.**

**Response:** The 2004 Forest Plan provides for up to 100 miles of new ATV trails on the Chequamegon landbase. Although the Forests are aware of the increase in ATV use over the past two decades, conflicting policies between the two Forests regarding motorized use in addition to user conflicts, and ongoing restrictions imposed to protect natural resources and primitive and semi-primitive recreation in certain areas has also been identified. The 2004 Forest Plan provides direction for a consistent, enforceable Forestwide policy that addresses the needs of ATV users, prevents unacceptable resource damage, and minimizes conflicts with other recreation activities.

There are numerous provisions in forest planning direction and regulations that allow the CNNF to amend the 2004 Forest Plan as needed to respond to changing conditions and new information and technology. The 2004 Forest Plan contains a Monitoring and Evaluation plan (Chapter 4) to determine the effectiveness of the Plan.

**PC #: 585**

**Public Concern: The Final EIS should include analysis of ATV and snowmobile impacts per vehicle mile traveled.**

**Response:** Based on information from the Wisconsin Department of Natural Resources (WDNR), the number of ATVs registered in Wisconsin rose from 25,600 in 1987 to 176,087 in 2002. Other than informal surveys and anecdotal evidence of activities on the Forests, the best gauge of user trends is the Statewide Comprehensive Outdoor Recreation Plan (SCORP) provided by the WDNR. Data collected for the 1991-1996 SCORP planning cycle indicated that 5% of Wisconsin residents participated in off-road motor vehicle activities and 6% in snowmobile activities at least once in 1990. Preliminary data for the 2000-2005 SCORP suggests that participation rates in ATV and snowmobile recreation have risen rapidly in the last decade and currently average about 12% and 14% of the state population, respectively. Although this data is not specific to the Chequamegon-Nicolet, it provides a fairly good overview of the outdoor recreation interests of the state population as well as a reasonable basis for the assumption that demand for motorized recreation opportunities on the Chequamegon-Nicolet will continue to rise in the coming years. Because the demand for increased motorized recreation opportunities on the Forests is fairly well-established, the Forest Service has decided to focus attention on monitoring the condition of motorized trails and road routes rather than commit limited funds to a study of "vehicle miles traveled" on the Forests. As the impacts of motorized use may be different from site to site, simply knowing the number of vehicle miles traveled may not be enough. By closely monitoring actual

trail/route conditions the Forests will be able to respond appropriately given specific local conditions whatever the traffic level.

**PC #: 566**

**Public Concern: The Final EIS should incorporate analyses of ATV impacts other regions.**

**Response:** Studies of ATV use in other regions have contributed to our understanding of the impacts of ATV use on the CNNF's forest resources. Recognizing that ATV use may result in resource damage and conflicts with other users, the CNNF will prepare a Monitoring Plan of Operations each year to identify and schedule site-specific, on-the-ground monitoring activities for off-road vehicle use. The Monitoring Plans will describe the legal monitoring requirements the Forests must address, the precision and reliability of monitoring techniques, the locations for monitoring, persons responsible for monitoring activities, and estimated monitoring costs.

It is generally recognized that ATV use can result in soil compaction, erosion and loss of understory plant species, introduction of non-native invasive species, and the disturbance of wildlife. All of these factors are likely to be closely monitored under the Annual Monitoring Plans of Operations for Off-Road Vehicles. The data collected through each Monitoring Plan will be summarized and evaluated in an Annual Monitoring Evaluation Report that will give forest managers the means to track management effectiveness from year to year.

**PC #: 603**

**Public Concern: The Final EIS should detail Chequamegon ATV resource damage and conflicts.**

**PC #: 127**

**Public Concern: The Chequamegon-Nicolet National Forests should not expand ATV use until a cost-benefit analysis has been conducted.**

**Response:** After more than a decade of an "open unless posted closed" ATV policy, the Chequamegon National Forest has discovered that certain land types such as wetlands, shorelands, riparian areas, and steep slopes, suffer disproportionate degradation when subject to ATV traffic. Forest managers have also discovered that excessive use in concentrated areas (such as hill climbs or play areas) can cause degradation of soils and plant life, trigger severe soil erosion, and present safety hazards. In addition to resource damage, the "open unless posted closed" ATV policy has also led to conflicts between motorized and non-motorized users.

The effects of ATV use are detailed in the FEIS and have guided development of forestwide ATV/OHV policy during all stages of forest plan revision. Both motorized and non-motorized uses are recognized as acceptable and legitimate uses of our National Forests. Thus, eliminating one use or another could not be considered as a possible solution to the problem. Instead, the resulting policy attempts to balance the competing demands of motorized and non-motorized enthusiasts while preventing unacceptable resource damage to the Forests' natural resources. The condition of ATV/OHV travelways and impacts of ATV/OHV use on forest resources will be closely monitored each year as described in the Annual Monitoring Plan of Operations.

**PC #: 112**

**Public Concern: The Forest Plan should prohibit use of ATVs.**

**PC #: 565**

**Public Concern: The Forest Plan should severely limit ATV forest access.**

**Response:** The Chequamegon-Nicolet National Forests recognize ATV use as a legitimate use of National Forest System lands under direction mandated by the Multiple-Use Sustained Yield Act of 1960. However, the Forests also recognize that the conflicting motorized use policies on the Chequamegon and the Nicolet, combined with conflicts between users and the restrictions imposed in certain areas to protect natural resources and primitive and semi-primitive recreation make the issue of ATV access extremely difficult to resolve. The 2004 Forest Plan provides direction for a consistent, enforceable forestwide policy that addresses the needs of ATV users, prevents unacceptable resource damage, and minimizes conflicts with other recreation activities.

**PC #: 573**

**Public Concern: The Forest Plan should prohibit ATV use on the Nicolet.**

**Response:** In the Notice of Intent to Prepare an Environmental Impact Statement (June 1996) for the Chequamegon-Nicolet National Forests, we recognized the two different approaches for the use of ATVs on the Forests. We also determined it was likely that more land would be available for ATV use on the Nicolet landbase. ATV suitability studies were done to determine areas best suited for the development of motorized recreation opportunities. Forestwide Goals, Standards, and Guidelines, as well as a Monitoring and Evaluation Plan, will help protect areas from adverse impacts.

The 2004 Forest Plan allows up to 85 miles of new ATV trails on the Nicolet. Specific locations of ATV trails will be determined at the district project level and public involvement will be solicited in the decision-making process. The location of trails will follow guidance in the 2004 Forest Plan and FEIS.

**PC #: 540**

**Public Concern: The Forest Plan should restrict ORV access to less than one percent of the Nicolet.**

**Response:** Miles of ORV trails amount to a very small percentage of the Nicolet landbase of the Forests. The 2004 Forest Plan provides direction that addresses the needs of ATV users, limits unacceptable resource damage, and minimizes conflicts with other recreation activities.

**PC #: 582**

**Public Concern: The Forest Plan should not open connector trails on the Nicolet.**

**Response:** The term “connector” was used in the DEIS and proposed Forest Plan to describe trails or routes that connect existing ATV trail systems. Public comments indicated that the term was confusing, leading forest planners to use more clear language to describe ATV travelways in the FEIS and 2004 Forest Plan. Under the 2004 Forest Plan and Selected Alternative, ATV travelways on both the Nicolet and Chequamegon will be called “routes”, if they follow numbered Forest Service roads that have been posted open to ATV use, or “trails” if they follow Forest trails posted open to ATV use.



**PC #: 584**

**Public Concern: The Forest Plan should not open trails in close proximity to Nicolet lakes.**

**Response:** Specific locations of ATV trails will be determined at the district project level and public involvement will be solicited in the decision-making process. The location of trails will follow guidance in the 2004 Forest Plan and FEIS.

**PC #: 571**

**Public Concern: The Forest Plan should limit ATV use on the Nicolet to designated routes and connectors.**

**Response:** The 2004 Forest Plan allows ATV use on designated trails and road routes only. Off-road, off-trail use is not permitted.

**PC #: 602**

**Public Concern: The Forest Plan should grant Nicolet trail designation authority to the Forest Supervisor.**

**Response:** Agency Manual Direction gives District Rangers full authority over decisions made on the specific land mass assigned to them. Therefore, District Rangers would be the deciding officer for trail designations. Multi-district or forestwide trail designations would fall under the authority of the Forest Supervisor.

**PC #: 530**

**Public Concern: The Forest Plan should limit ATV access to existing snowmobile trails and forest right-of-ways.**

**PC #: 534**

**Public Concern: The Chequamegon-Nicolet National Forests should relocate snowmobile trails to facilitate year-round shared use with ATVs.**

**Response:** Sharing trail use between snowmobiles and ATVs where appropriate is not a decision made in a forest plan. This would be made at the site-specific project level using guidance established in the 2004 Forest Plan, including management area direction, Scenic Integrity Objectives, and ATV Suitability.

**PC #: 532**

**Public Concern: The Forest Plan should limit ATV use during spring thaw and other periods when soil is vulnerable.**

**Response:** Standards in the 2004 Forest Plan prohibit ATV use during periods of spring when the roads and trails are wet enough to cause undesirable amounts of damage from normal vehicular traffic.

**PC #: 572**

**Public Concern: The Forest Plan should limit ATV use in riparian areas.**

**Response:** Forestwide Objectives (1.3b – Aquatic Ecosystems, and 2.1c – Recreation Opportunities) are in place to reduce the impacts of ATVs on wetlands and other sensitive areas. Additionally, Forestwide Standards do not allow new ATV trail or routes construction through wetlands when alternative locations are feasible. These objectives and standards will be implemented at the site-specific project level decision process.

**PC #: 513**

**Public Concern: The Forest Plan should close the Boulder Lake Campground and Campground Drive to ATVs.**

**Response:** A decision to of this type would be done at the site-specific project level using guidance established in the 2004 Forest Plan, including management area direction, Scenic Integrity Objectives, and ATV Suitability. Boulder Lake Campground is considered an “Intermediate Suitability” area for ATV use.

**PC #: 577**

**Public Concern: The Forest Plan should reinstate the ban on ATVs at Old Grade Road along Atkins Lake.**

**Response:** Decisions to open or close roads would be a part the of site-specific project level process. Old Grade Road is located on the Nicolet landbase, which prohibits ATV use under the 1986 Forest Plan. As a result, it is likely the road was opened to ATVs by a town ordinance. The 2004 Forest Plan calls for collaboration with Town governments to improve ATV routes on the Nicolet.

**PC #: 546**

**Public Concern: The Forest Plan should close the Washburn District "free play" area.**

**PC #: 586**

**Public Concern: The Forest Plan should allow the ATV play area north of Ino to remain open.**

**PC #: 113**

**Public Concern: The Forest Plan should not close the Open 26 ATV play area.**

**PC #: 605**

**Public Concern: The Forest Plan should not close intensive use areas.**

**Response:** An alternative that provided an increase in ATV intensive use areas was considered but eliminated from detailed study. Currently, there is one intensive use area, known as Open 26, on the Forests. Open 26 is approximately 35 acres in size and much smaller than ATV intensive use areas funded by the state of Wisconsin. Over time, use of Open 26 has created potential safety hazards on steep slopes. In general, intensive use areas like Open 26 are detrimental to the landscape, even when carefully managed and maintained. As a result, a conclusion was reached that such use is not compatible with the recreational and ecological goals for the Forests, and an increase in size or continued use of the existing area were not considered further. One of the Objectives (2.1h) in the 2004 Forest Plan is to “close and rehabilitate one ATV ‘intensive use’ area.”

**PC #: 587**

**Public Concern: The Forest Plan should apply automobile restrictions to ATVs on the Chequamegon NF.**

**Response:** The 2004 Forest Plan will not permit off-trail or off-road ATV use. The decision to allow dual-use of roads would be determined on a case-by-case basis at the project level. Public involvement would be solicited in the decision-making process.

**PC #: 536**

**Public Concern: The Forest Plan should allow ATV off-road tire use only when snow pack is greater than four inches and should ban tire chains.**

**Response:** Respondent(s) recommended requiring use of tires with non-aggressive tire tread patterns by ATV's for summer use. Once ATV/OHV use is restricted to designated routes and trails and trail condition monitoring is ongoing, consideration may be given to such recommendations, if necessary.

**PC #: 581**

**Public Concern: The Forest Plan should include ATV noise restrictions.**

**Response:** Standards in the 2004 Forest Plan require snowmobiles and ATVs to meet sound attenuation requirements defined in Wisconsin statutes.

**PC #: 544**

**Public Concern: The Chequamegon-Nicolet National Forests should rely on Wisconsin snowmobile and ATV programs to fund additional trails.**

**PC #: 549**

**Public Concern: The Forest Plan should require permittees who maintain trails to post performance bonds.**

**Response:** The Chequamegon-Nicolet National Forests receive funding from state ATV and snowmobile registration for trail maintenance. It is possible for ATV clubs, through a Memorandum of Understanding or a Special Use Permit, to be able to manage a trail or segment of a trail. Specific agreements, conditions, types of bonds, or stipulations could be developed at the site-specific project level, requiring the permittee to be responsible for certain types of trail maintenance.

**PC #: 570**

**Public Concern: The Forest Plan should prioritize trail maintenance.**

**Response:** The Forests recognize that ATV use has increased rapidly over the past two decades. However, conflicting motorized use policies on the Chequamegon and Nicolet, user conflicts, and the need to impose restrictions in certain areas to protect natural resources and primitive and semi-primitive recreation make the issue difficult to resolve. The 2004 Forest Plan provides direction for a consistent, enforceable forestwide policy that addresses the needs of ATV users, prevents unacceptable resource damage, and minimizes conflicts with other recreation activities.

It is possible for ATV clubs, through a Memorandum of Understanding or a Special Use Permit, to be able to manage a trail or segment of a trail. Specific agreements, conditions, or stipulations could be developed at the site-specific project level.

**PC #: 591**

**Public Concern: The Chequamegon-Nicolet National Forests should not remove timber to construct new ATV trails.**

**Response:** The decision to cut trees for the purpose of trail construction is one that would be determined at the project level; public involvement would be solicited in the decision-making process. Guidance in the 2004 Forest Plan will be followed. One of the Forestwide Guidelines for Social—Recreation Programs (Chapter 2 of the 2004 Forest Plan) states, "Use existing corridors for new all-terrain vehicle, snowmobile, and other off-road vehicle routes, wherever possible."

**PC #: 604**

**Public Concern: The Forest Plan should combine new trail and connector mile totals.**

**Response:** The 2004 Forest Plan and FEIS have combined the mileage for trails and connectors (routes). Under the Selected Alternative, there will be up to 100 miles of new ATV trails on the Chequamegon landbase and up to 85 miles on the Nicolet landbase.

**PC #: 595**

**Public Concern: The Forest Plan should permit motorized trails to include grades steeper than five percent.**

**Response:** Motorized trails are more like permanent roads than skid trails and a sustained grade of 5 percent is considered steep on a permanent road from the standpoint of erosion and sedimentation. Motorized trails on the National Forests get heavy use through out the growing season and most grades above 5 percent have erosion problems. Skid trails are used for a limited period of time under the supervision of a timber sale administrator and a substantial amount of skidding occurs in winter. If erosion or rutting get to severe the administrator can halt operations and require mitigation. After a sale closes, skid trails are revegetated and water control structures installed if necessary. Sustained grade is intentionally not specifically defined to allow some professional discretion on the ground depending on soils and other site conditions, but is probably in the range of 125-200 feet. If a 5 percent grade cannot be avoided, the guideline requires the surface to be stabilized and cross drains to be installed.

**PC #: 757**

**Public Concern: The Forest Plan should not require only OHV clubs to reach trail maintenance and monitoring partnership agreements.**

**Response:** Four-wheel drive vehicle (4WD) trails/routes are especially expensive and difficult to maintain because of the size and weight of the vehicles. As a result, Forest Service funding may not be adequate to maintain safe conditions and prevent resource damage due to trail use. For these reasons, requiring 4WD clubs to reach maintenance and monitoring agreements was deemed necessary in order to ensure the long-term operation of 4WD trails on the Forests.

**PC #: 618**

**Public Concern: The Forest Plan should clarify four-wheel drive vehicle restrictions on trails and roads.**

**Response:** In the 2004 Forest Plan, street-legal four-wheel drive (4WD) vehicles are permitted on all system roads open to general public vehicle traffic and on the existing 4WD route on the Lakewood District of the Forests. Off-road/off-trail use of 4WD vehicles is not permitted. Information regarding 4WD vehicle restrictions on trails and roads has been clarified in Chapter 4 of the FEIS, "ATVs and Off-Road Vehicles."

**PC #: 576**

**Public Concern: The Forest Plan should clarify the difference between automobiles and ATVs.**

**Response:** The respondent is referring to a guideline that permits private landowners to use non-street legal off-road vehicles to access their inholdings when the use of such vehicles would cause less damage than full-sized vehicles. In response to this comment, the intent of this guideline has been clarified in Chapter 2 of the 2004 Forest Plan (Social—Recreation Programs; Off-Road Vehicle Use).

**PC #: 516**

**Public Concern: The Forest Plan should not allow OHVs to use roads deemed unsuitable for ATVs or roads where soils are wet or easily damaged.**

**Response:** Respondent(s) suggest prohibiting 4-Wheel-Drive (4WD) vehicle use on native-surfaced roads within “unsuited” areas shown on the ATV suitability map. The Forests used the ATV Suitability Inventory to identify and map the Forests according to their suitability for ATV trail construction (either least, intermediate, or most suitable; see ATV Suitability Map in Map Set). Forestwide guidelines specify that new all-terrain vehicle trails will not be constructed in areas identified as least suitable through the inventory, unless no other options are available and potential environmental effects can be mitigated. In general, 4WD vehicles will not be allowed on ATV trails. They will be allowed on all roads open to the public if they meet State laws for licensed vehicles. Road closures for 4WD vehicles will be considered at the project, site-specific level, since many of these vehicles are also street-legal and may travel on all open roads.

Forestwide Standards and Guidelines also introduce restrictions on the use of motorized trails and roads during the spring season that will further reduce the likelihood that ATVs/OHVs will be used on wet or easily damaged soils. See the “ATVs and Off Road Vehicles” sections of Chapter 3 and 4 of the final EIS for more information about the Forests’ ATV/OHV policies under the 2004 Forest Plan.

**PC #: 620**

**Public Concern: The Forest Plan should clarify the meaning of "closed unless stated open."**

**Response:** The Forest Service attempts to clarify the meaning of the “closed unless posted open” policy in the “ATVs and Off Road Vehicles” section of Chapter 3 of the FEIS. The 2004 Forest Plan restricts ATV’s to designated roads and designated motorized trails specifically signed, or posted, for such use. All National Forest roads, trails, and general forest lands will be considered closed to ATV’s unless signed and designated otherwise. Motorized, street-legal vehicles may use Forest Service roads that are open to public motorized use (not gated or otherwise closed). These same vehicles, such as 4-Wheel-Drive vehicles, become Off-Highway Vehicles if they travel on trails, and may only do so if the trail is posted for their specific use. Under the 2004 Forest Plan, the expectation is for one such trail at one site on the Lakewood District.

**PC #: 624**

**Public Concern: The Final EIS should consider a range of snowmobile route alternatives.**

**PC #: 623**

**Public Concern: The Forest Plan should restrict off-trail/off-road snowmobiling only in Management Areas 5, 5B, 6, and 8.**

**Response:** There are an estimated 1,000 miles of groomed snowmobile trails within Forest boundaries on public and private land. Additionally, snowmobiles have legal access to hundreds of miles of unplowed roads. Some of the Chequamegon snowmobile trails serve a dual function as seasonal ATV trails. A major concern with off/road off/trail riding is a safety and liability issue resulting from inviting a particular use without regulating how that use will take place (i.e., trail design, speed limits, traffic control, etc.).

The Notice of Intent to Prepare an Environmental Impact Statement (June 1996) for the Chequamegon-Nicolet National Forests stated that snowmobile use was a topic where

little or no change was warranted. It also states “The general policy that snowmobiles can be operated on designated trails and on unplowed roads will not be revisited. Some changes will be made to provide consistency between the two forests.” The Guideline developed for snowmobiles provides this needed consistency on both land bases. Since snowmobile use was not recognized as a revision topic, it was not analyzed in detail in the formulation of alternatives.

Forestwide Goals and Objectives, Standards and Guidelines, and Management Area allocations were developed as a result of interactions with a variety of user groups, as well as consultation with local, county, and state governments.

**PC #: 504**

**Public Concern: The Forest Plan should relocate snowmobile trails off plowed township roads and county highways.**

**PC #: 484**

**Public Concern: The Forest Plan should presume continued snowmobile use in non-motorized areas, unless all parties involved agree on trail relocation.**

**Response:** Not all township and county roads are under Forest Service jurisdiction. It would be the responsibility of individual townships to restrict snowmobile use on their roads. In cases where the road is under Forest Service jurisdiction, any decisions to relocate or reroute a trail would be done at the site-specific project level.

**PC #: 622**

**Public Concern: The Forest Plan should not require relocation of snowmobile trails bordering the proposed Flynn Lake Wilderness Area.**

**Response:** There is no requirement for relocating existing snowmobile trails on the boundary of the Flynn Lake Wilderness Study under the Selected Alternative and 2004 Forest Plan.

**PC #: 641**

**Public Concern: The Chequamegon-Nicolet National Forests should limit motorized boating.**

**Response:** The Chequamegon-Nicolet National Forests do not have the authority to prohibit motorized use on water bodies. Local townships make these decisions. However, Standards and Guidelines in the 2004 Forest Plan prohibit any net increase in motorized vehicle access to lakes, and limit the construction of boat landings on lakes where it is appropriate. There are also Management Prescriptions in the Forest Plan that provide direction for management of watersheds, riparian areas and aquatic resources across the Forests.

**PC #: 395**

**Public Concern: The Forest Plan should allow only portage access to the complex of small, wild lakes in the Twin Lake area.**

**Response:** The designation of access type on individual lakes is a decision that would be made at the site-specific level, where public input will be solicited. The 2004 Forest Plan provides programmatic direction for lake access issues through standards and guidelines for Recreation Facilities and Access Management. The plan also provides for non-motorized experiences through the designation of management areas, specifically MA 5, 5B, 6A, 6B, and Non-Motorized with vegetation management (NM). The Selected



Alternative has 4,280 lake acres within non-motorized management areas. This is a 2,582 acre increase over the current condition.

**PC #: 637**

**Public Concern: The Forest Plan should allow only portage access to Club Lake.**

**Response:** Any decision to change access to Club Lake is one that would be made at the site specific project level. Public participation would be solicited in the decision-making process.

**PC #: 621**

**Public Concern: The Forest Plan should designate off-road motorcycle trails in the Nicolet.**

**Response:** The establishment of single-track motorcycle trails was identified as a topic to be considered during the development of the 2004 Forest Plan and was not part of the Purpose and Need for action in the FEIS. However, motorcycles have been included in the definition of an ATV (See Glossary Appendix EE of the 2004 Forest Plan) and are expected to be able to use the same roads and trails as ATV's.

**PC #: 539**

**Public Concern: The Chequamegon-Nicolet National Forests should create an off-road motorcycle park.**

**Response:** Motorcycles fall under the definition of All-Terrain Vehicles in the 2004 Forest Plan (Appendix EE), which means they can access the same trails and roads that are posted open to all-terrain vehicles. Off-road motorcycle parks would be similar to all-terrain vehicle intensive use areas. An alternative providing intensive use areas for ATVs and motorcycles was considered but eliminated from detailed study because it was not considered compatible with the recreational and ecological goals for the Forests.

**PC #: 628**

**Public Concern: The Forest Plan should allow continued motorized use on some trails in non-motorized areas.**

**Response:** Specific trail re-routing decisions will take place during site-specific project level analysis where public participation will be solicited.

## Non-Motorized Recreation

**PC #: 630**

**Public Concern: The Forest Plan should designate bicycle trails.**

**Response:** Decisions to develop new trails, enhance existing trails, or permit dual use of those trails would be made at the site-specific project level. Public involvement would be solicited during that process.

**PC #: 125**

**Public Concern: The Forest Plan should expand non-motorized recreation areas.**

**Response:** The need for more non-motorized recreation areas was identified as one of the 10 major forest plan revision issues. The 2004 Forest Plan and EIS have increased opportunities for non-motorized experiences on the Forests by establishing management areas designated for that specific purpose. Management Area 5 (Wilderness), MA 5B

(Recommended Wilderness Study Areas), MA 6A and 6B (Semi-Primitive Non-Motorized areas), and Non-Motorized with full vegetation management (NM) all provide quality non-motorized recreation opportunities on the Forests.

**PC #: 161**

**Public Concern: The Forest Plan should designate trails for equestrian use.**

**Response:** Currently, there are approximately 90 miles of equestrian trails on the Chequamegon-Nicolet National Forests. Forestwide Standards and Guidelines have been established in the 2004 Forest Plan for horse trails. New trails, or enhancements to existing trails, are decisions that would be made at the site-specific project level. Public involvement would be solicited during that process.

**PC #: 635**

**Public Concern: The Forest Plan should prohibit horseback riding in the St. Peter's Dome area.**

**Response:** Horses are currently prohibited on the Morgan Falls Trail (the trail to St. Peter's Dome) to limit the introduction of non-native plants.

## Hunting

**PC #: 574**

**Public Concern: The Forest Plan should limit ATV use during hunting season.**

**Response:** During the preparation of the EIS, the Forests analyzed the effects of allowing ATV use on designated road routes. All alternatives, except Alternatives 3, 4, 7, and 9, provided opportunities for ATV route designation. A range of open time periods for those ATV routes—from year-round to just two months per year during hunting season—was considered. After internal discussions, consideration of public comments, and consultations with the State, the Forests determined that keeping routes open year round except during spring breakup was the best option.

**PC #: 535**

**Public Concern: The Chequamegon-Nicolet National Forests should grant hunters ATV access to all roads and trails.**

**Response:** Driving an ATV, whether for recreation or for hunting, falls under the category of motorized use in the 2004 Forest Plan and EIS. ATV use on the Forests could result in unacceptable resource damage regardless of whether the vehicle is being used for recreation or hunting. Roads and trails open to motorized use benefit users who prefer a motorized experience. We believe the 2004 Forest Plan and EIS provides a balance of non-motorized and motorized use for the American public.

**PC #: 631**

**Public Concern: The Final EIS should include detailed analysis of recreational hunting opportunities.**

**Response:** Recreational hunting was not considered a priority topic in need for change during forest plan revision. As a result, recreational hunting itself was not analyzed, although the effects of many proposed changes on hunting were considered as part of the effects analysis for specific forest resources.

**PC #: 632**

**Public Concern: The Forest Plan should change the proposed Management Area 5B designation for Flynn Lake to 6B to lower hunter densities.**

**Response:** A wide range of alternatives with various levels of outputs and services, and varying Management Area allocation addressing the plan revision topics of Access and Recreation opportunities, Biological Diversity, Special Land Allocations, and Timber production were analyzed in the Draft Environmental Impact Statement (DEIS). Each of the alternatives in the DEIS and the Final EIS meets the intent of various laws, including multiple use management, under which the national forests are managed. The Selected Alternative in the FEIS was developed by modifying Alternative 5 based on comments received on the Proposed Forest Plan and Draft EIS. It represents what Forest managers believe to be the best balance of outputs and services in achieving sustainable ecosystems and meeting the intent of various laws, as well as in addressing the issues and concerns specific to the management of the Chequamegon-Nicolet National Forests that were identified in the public concerns.

**PC #: 627**

**Public Concern: The Forest Plan should require all forest visitors to wear blaze orange during hunting season.**

**Response:** While we do not require forest visitors to wear blaze orange during hunting season, educational materials in the form of news articles, brochures, web postings, and posters are used to inform the public of the various hunting seasons and to advise the public to wear blaze orange so they are more noticeable in the Forests.

**PC #: 626**

**Public Concern: The Forest Plan should prohibit spring hound training.**

**Response:** Bear hunting and dog training is regulated by the Wisconsin Department of Natural Resources (WDNR). For the purposes of consistency and enforcement, any regulations established by the WDNR apply equally to Chequamegon-Nicolet National Forests lands.

**PC #: 272**

**Public Concern: The Forest Plan should allow steel-jawed trapping of predators.**

**Response:** Trapping and hunting on the Chequamegon-Nicolet National Forests is regulated by the Wisconsin Department of Natural Resources. However, there are areas on the Great Divide and Eagle River-Florence Ranger Districts where dry land trapping in Marten Restoration Areas is prohibited.

**PC #: 601**

**Public Concern: The Forest Plan should permit three-season ATV use on roads in the Chequamegon.**

**Response:** The 2004 Forest Plan and FEIS will allow ATV route use year round with the exception of spring breakup.

## Mushing

**PC #: 476**

**Public Concern: The Forest Plan should permit mushers to utilize ATVs to train dog teams.**

**Response:** On the Chequamegon, ATV use will be permitted on all classified system roads (clearly posted as ATV routes) except those closed by project level decisions or where the Forest Service lacks authority for such designation. On the Nicolet, the agency will work with township officials to identify existing classified system roads for designation as posted ATV routes. Total mileage of the route system will depend on many factors, including the number of problems experienced (violations, resource damage, conflicts with other users, etc.).

The Selected Alternative allows ATV use on designated trails and routes year-round except during spring breakup. This should allow ample opportunities for mushers to train their dogs during the non-snow months.

## Monitoring and Enforcement

**PC #: 642**

**Public Concern: The Forest Plan should include highly detailed, consistent enforcement plans.**

**PC #: 579**

**Public Concern: The Chequamegon-Nicolet National Forests should increase efforts to enforce ATV restrictions.**

**PC #: 644**

**Public Concern: The Chequamegon-Nicolet National Forests should strengthen penalties for violators of ATV regulations and policies.**

**PC #: 583**

**Public Concern: The Chequamegon-Nicolet National Forests should open Nicolet trails only after a sufficient enforcement staff is in place.**

**Response:** Law enforcement issues such as the enforcement of regulations and fines are not decisions made in forest plans. Law Enforcement is an administrative procedure separate from the land management planning process that follows existing statutes, regulations, and Forest Service policy (FSM 5302 and FSH 5309.11 and others).

In addition to Law Enforcement Officers, there are many Forest Protection Officers at all the district offices. They have the authority to issue violation notices and warnings. Many district offices also engage in Cooperative Law Enforcement agreements with local sheriff and police departments that patrol areas on the Forests and have the authority to issue violation notices and warnings.

The 2004 Forest Plan provides direction for a consistent, enforceable forestwide policy that addresses the needs of ATV users, prevents unacceptable resource damage, and minimizes conflicts with other recreation activities. For the Chequamegon land base, new restrictions prohibiting off-road, off-trail ATV use should improve enforcement efforts. Because off-road, off-trail travel was permitted on much of the Forest under the 1986 Plan, an individual riding illegally on a road or trail closed to ATV use needed only to leave the travelway and ride into the forest to avoid citation.

An additional policy in the 2004 Forest Plan that should improve enforcement efforts on the Chequamegon is that only roads designated and signed as ATV routes are open to ATV use. In the 1986 Plan, roads on the Chequamegon land base were only signed if they were closed to specific off-road vehicles.

**PC #: 83**

**Public Concern: The Forest Plan should use education, rather than restrictions, to achieve responsible trail use.**

**Response:** The forestwide standard (Social—Recreation Programs; Off-Road Vehicle Use) prohibiting trail use during certain times of the year is an effective and practical way to protect the Forests and trails from unacceptable resource damage.

There are times when unique conditions could warrant travel restrictions outside of the trail closure time period described in the standard. In such a situation, Forest Service personnel in the field would inform users of the conditions and request their cooperation in staying off the trails until the conditions become more favorable.

**PC #: 568**

**Public Concern: The Chequamegon-Nicolet National Forests should collaborate with local clubs and townships to enforce policies and limit conflicts.**

**Response:** On the Chequamegon, ATV use will be permitted on all classified system roads (clearly posted as ATV routes) except those closed by project level decisions. On the Nicolet, the Forests will be collaborating with local townships to enhance existing town-designated ATV routes by designating existing Forest Service roads as ATV routes. Total mileage of the route system will depend on many factors, including the number of problems experienced (violations, resource damage, conflicts with other users, etc.). The Forest Service expects to cooperate with local ATV users and clubs to assist in maintaining the signs and routes and to help ensure users are riding safely, not trespassing on private lands, and not damaging National Forest lands.

**PC #: 538**

**Public Concern: The Chequamegon-Nicolet National Forests should authorize all field personnel to enforce ATV regulations.**

**Response:** The Federal laws that established the Forest Service (USC 16, Sec. 559) give all employees the authority to arrest citizens violating laws and regulations. However, USDA Forest Service policy limits this authority to Forest Protection Officers, Law Enforcement Officers, and Special Investigators. There are several Forest Protection Officers on the Chequamegon-Nicolet National Forests who have the authority to issue violation notices and warnings. While other field employees do not have the authority to issue violation notices or warnings, they do serve as “eyes and ears” and report any illegal activity to the proper authorities.

**PC #: 564**

**Public Concern: The Chequamegon-Nicolet National Forests should enforce the ATV ban on National Scenic Trails.**

**Response:** In the 1986 Chequamegon Plan, ATV use was permissible on much of the Forest except those areas or travelways posted as closed to ATVs. This seemed to encourage some ATV riders to illegally explore even those trails/areas that were posted as closed to ATVs. Because off-road, off-trail travel was permitted on much of the

Chequamegon under the 1986 Plan, an individual riding illegally on a road or trail closed to ATV use needed only to leave the travelway and ride into the forest to avoid citation.

The 2004 Forest Plan restricts ATVs to designated and posted trails and routes on both the Chequamegon and the Nicolet. This should help clarify precisely where, when and how ATV riders can use their machines on the Forests.

We recognize that enforcement of ATV closures is difficult when those few riders who do ride in closed areas are there infrequently. We welcome groups who would be willing to work with us to improve enforcement on the trails.

### **REQUIRE MONITORING OF NATIONAL SCENIC TRAILS**

**Response:** Future monitoring of the Ice Age and North Country National Scenic Trails will occur much as past monitoring has occurred. Past monitoring activities have included informal physical inspection of the trails and evaluation of comments received from the public. Similar monitoring activities are likely to continue in the future. To date, there is no known conflict between hikers and other non-motorized users of these two trails.

**PC #: 548**

**Public Concern: The Forest Plan should include provisions for enforcement of the Moquah Barrens ATV closure.**

**Response:** Decisions to install any additional barriers or other devices to restrict motorized access to Moquah Barrens would be made during the site-specific project level. Public involvement would be solicited at that time.

**PC #: 578**

**Public Concern: The Chequamegon-Nicolet National Forests should police ATV use of the Ice Age Trail.**

**Response:** In the 1986 Chequamegon Plan, ATV use was permissible on much of the Forest except those areas or travelways posted as closed to ATVs. This seemed to encourage some ATV riders to illegally explore even those trails/areas that were posted as closed to ATVs. Because off-road, off-trail travel was permitted on much of the Chequamegon under the 1986 Plan, an individual riding illegally on a road or trail closed to ATV use needed only to leave the travelway and ride into the forest to avoid citation.

The 2004 Forest Plan restricts ATVs to designated and posted trails and routes on both the Chequamegon and the Nicolet. This should help clarify precisely where, when, and how ATV riders can use their machines on the Forests.

We recognize that enforcement of ATV closures is difficult when those few riders who do ride in closed areas are there infrequently. We certainly welcome any group who would be willing to work with us to improve enforcement on the trails.

**PC #: 238**

**Public Concern: The Forest Plan should include a monitoring plan for ATV use.**

**PC #: 567**

**Public Concern: The Chequamegon-Nicolet National Forests should monitor ATV use and adjust restrictions as needed.**

**Response:** The Monitoring and Evaluation Plan in the 2004 Forest Plan contains minimum legally required monitoring requirements established by the National Forest



Management Act regulations. One of resources to be measured is the effect of off-road vehicles (36 CFR 219.21). See Chapter 4 of the Forest Plan for more detailed information. Inappropriate off-road usage, if any, could be addressed immediately through the issuance of a temporary Forest Supervisor Closure Order followed by further evaluation at the district level during site-specific project planning.

**PC #: 643**

**Public Concern: The Chequamegon-Nicolet National Forests should divert road-building funds to support enforcement of ATV regulations.**

**Response:** Funding received by the Chequamegon-Nicolet National Forests is based on budget allocations from Congress. In general, the Forest Service cannot deviate from these allocations and move funds from one purpose to another.

**PC #: 81**

**Public Concern: The Forest Plan should include public safety provisions.**

**Response:** Public hazards, such as snags or other hazard trees in campgrounds, are addressed at the site-specific level when identified on the ground. Removal of hazard trees at campgrounds and on trails is performed as general maintenance on the Forests. Various brochures, signs, and other information materials at recreation facilities and Forest Service offices inform the public of other safety alerts and hazards.

Law enforcement and the enforcement of regulations are not decisions made in forest plans. The availability of law enforcement resources is an administrative procedure separate from the land management planning process that follows existing statutes, regulations, and Forest Service policy (FSM 5302 and FSH 5309.11 and others).

## **Elderly and Disabled Access**

**PC #: 117**

**Public Concern: The Forest Plan should ease restrictions on motorized use to accommodate elderly access to the forest.**

**PC #: 119**

**Public Concern: The Forest Plan should ease restrictions on motorized use to accommodate disabled access to the forest.**

**Response:** There is an estimated 1,000 miles of groomed snowmobile trails on public and private land within Forest boundaries. Additionally, snowmobiles have legal access to hundreds of miles of unplowed roads. Some of the Chequamegon snowmobile trails serve a dual function as seasonal ATV trails.

The 2004 Forest Plan and FEIS will allow the development of up to 100 miles of new ATV trails on the Chequamegon land base (in addition to the current 284 miles of existing trails) and up to 85 miles on the Nicolet land base.

**PC #: 107**

**Public Concern: The Forest Plan should allow accompaniment of those with motorized disabled access permits.**

**Response:** Reference to disabled user ATV permits has been removed from the 2004 Forest Plan on the basis that it is an administrative process, and is not a decision made in a Forest Plan.

**PC #: 499**

**Public Concern: The Forest Plan should encourage physical activity by closing all roads and trails to ATV use.**

**Response:** The need for more non-motorized recreation areas was identified as one of the 10 major forest plan revision issues. The 2004 Forest Plan for the Chequamegon-Nicolet National Forests offers quality non-motorized recreation opportunities that emphasize remoteness, solitude, and personal challenges for those who prefer more physical activity.

The Multiple-Use Sustained-Yield Act of 1960 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.” The 2004 Forest Plan and EIS provide a balance between motorized and non-motorized use on the Chequamegon-Nicolet National Forests that best meets the needs and preferences of the diverse American public.

### **Recreation: Developed Facilities**

**PC #: 636**

**Public Concern: The Chequamegon-Nicolet National Forests should not construct boat landings.**

**Response:** According to a forestwide standard in the 2004 Forest Plan, there will be no net increase in motorized vehicle access to lakes, with the exception of access associated with lakes in new land acquisitions. If roaded access is provided to a lake that is not a new acquisition and previously did not have such access, another lake on the forest will have roaded access removed.

**PC #: 645**

**Public Concern: The Chequamegon-Nicolet National Forests should establish additional tent-only campgrounds.**

**Response:** The Chequamegon-Nicolet National Forests Land and Resource Plan does not prohibit the construction of new campgrounds or the re-design of existing campgrounds. Adding or modifying campgrounds is a decision that would be made at the site-specific project level. Public involvement would be solicited in the decision-making process.

### **Signage**

**PC #: 493**

**Public Concern: The Chequamegon-Nicolet National Forests should post use limitations on all trails and roads.**

**Response:** Multi-use trail systems and signage of such trails are decisions that would be made at the site-specific project level. Public input would be solicited in the decision-making process.

Under the 2004 Forest Plan, all motorized trails and routes will be clearly signed for use by specific motorized vehicles.

**PC #: 580**

**Public Concern: The Final EIS should provide evidence that signs are an effective means to police illegal ATV use.**

**Response:** Under the 2004 Forest Plan, signs will be used to indicate when a road or trail is open, not when it is closed. A “closed unless posted open” policy is a step the Forests

have taken to provide for ATV use while protecting resources, minimizing conflicts with other users, and providing a consistent, enforceable Forestwide policy.

Enforcement of regulations and fines, as well as law enforcement methods and budgets, are not decisions that are made in forest plans. Law Enforcement is an administrative procedure separate from the land management planning process that adheres to existing statutes, regulations, and Forest Service policy (FSM 5302 and FSH 5309.11 and others).

## Fees

**PC #: 575**

**Public Concern: The Chequamegon-Nicolet National Forests should require all forest users to pay fees.**

**PC #: 533**

**Public Concern: The Forest Plan should require ATV users to pay fees of sufficient amount to fund maintenance and enforcement of regulations.**

**Response:** Decisions on user fees and funding for maintenance and enforcement of regulations are not made in a forest plan. In general, the ability of the Chequamegon-Nicolet National Forests to collect user fees as well as the types of fees collected is determined by national programs and policies.

## Landownership

**PC #: 71**

**Public Concern: The Chequamegon-Nicolet National Forests should expand to abut the Ottawa National Forest.**

**Response:** Expanding the boundary of the Forests is not part of Forest Plan decision-making. The proclaimed boundaries of the Chequamegon-Nicolet National Forests were established in the 1930s. Any changes to the boundaries would have to be approved by Congress.

**PC #: 72**

**Public Concern: The Chequamegon-Nicolet National Forests should encourage conservation of nearby private lands.**

**Response:** The 2004 Forest Plan provides management direction for National Forest System lands, not private land. However, if an easement were required to access private land surrounded by National Forest system land, it would contain direction that would be consistent with the management goals of the surrounding area.

**PC #: 118**

**Public Concern: The Chequamegon-Nicolet National Forests should not sell or trade forest land to developers for subdivisions.**

**Response:** Among the Forests' highest priority acquisition goals are to acquire properties (willing seller only) with lake or river frontage to enable the American public to enjoy these lands and waters in perpetuity. The Forests strive to acquire these tracts "in fee", meaning that the Forests receive all the rights to the property. Easements are considered when "in fee" acquisitions are not possible.

**PC #: 56**

**Public Concern: The Chequamegon-Nicolet National Forests should only consider land acquisitions for multiple uses.**

**Response:** By law, all national forest lands are managed for multiple uses. Management activities that occur on newly acquired land would be determined based on the attributes of the site. Management activities may be similar to those on adjacent national forest lands or, if the newly-acquired land has attributes that are unique or different than the surrounding land, the management prescription would be determined by an integrated team of specialists.

## **Rights-of-Way**

**PC #: 73**

**Public Concern: The Chequamegon-Nicolet National Forests should update maps to correctly identify the status of roads, particularly 2864.**

**Response:** Road information on topographical maps is updated approximately every seven years. Specific road access concerns are not decisions made in forest plans. These concerns should be brought to the attention of District personnel where the road in question is located.

**PC #: 45**

**Public Concern: The Chequamegon-Nicolet National Forests should clarify special use permits for private property.**

**Response:** The Chequamegon-Nicolet National Forests' Notice of Intent to revise the Forest Plans (1996) provided a list of items, including the rights of existing permittees and easement holders that would not be addressed during forest plan revision. Although the issues of permittee and easement holder rights were not revisited during forest plan revision, it is possible some terms of the permits and easements may be reviewed to achieve consistency with Standards and Guidelines for the 2004 Forest Plan.

**PC #: 208**

**Public Concern: The Forest Plan should include military training as an approved activity for special use permits.**

**Response:** Direction to allow military training exercises on national forests is found in the Forest Service Manual system (FSM 2724.31) and is therefore not repeated in the 2004 Forest Plan. The Forests do and will continue to permit military training exercises based on this direction.

## Special Designations General

**PC #: 343**

**Public Concern: The Forest Plan should establish special designation areas.**

**PC #: 342**

**Public Concern: The Forest Plan should not establish additional special designation areas.**

**PC #: 353**

**Public Concern: The Chequamegon-Nicolet National Forests should be applauded for its use the Landscape Analysis and Design process to identify potential special designation areas.**

**Response:** Management Areas 8E (Existing and Candidate Research Natural Areas), 8F (Special Management Areas) and 8G (Old Growth and Natural Feature Complexes) are often referenced as Special Designations or Ecological Reference Areas. Some Ecological Reference Areas are also embedded in Wilderness.

MA 8E is characterized by ecologically significant natural features, representative ecosystems, and/or unique areas. MA 8F is characterized by areas of physical, biological, and cultural features of forestwide or regional significance that may also serve as reference sites for research and monitoring. There are approximately 99,000 acres of MA 8E and 8F in the Selected Alternative and 2004 Forest Plan. While Special Management Areas can be designated administratively or by legislation, existing and candidate Research Natural Areas are designated administratively by the Regional Forester.

These designations are an integral part of addressing the biological diversity planning topic. They help provide a balance between competing concerns that we feel best meets the needs of the diverse American public while addressing the issues and concerns specific to the management of the Chequamegon-Nicolet National Forests as identified in public comments.

## Roadless Areas

**PC #: 74**

**Public Concern: The Forest Plan should designate more roadless areas based on the work of agency biologists.**

The 2002 Roadless Area Inventory and Wilderness Evaluation Report for the Chequamegon-Nicolet National Forests describes the process and criteria for identify areas to be considered for Wilderness Study. Part of the process is to consider the ecological value of areas being considered. As a result of the Roadless area inventory and evaluation, eight areas were included in various alternatives considered in detail in the FEIS. Chapter 2 of the FEIS provides a comparison of alternatives considered in detail for ecological value of the eight areas. The 2004 Forest Plan includes recommendation of three areas totalling 15,500 acres to be considered for Wilderness Study (MA 5B).

## Wilderness Areas

**PC #: 75**

**Public Concern: The Chequamegon-Nicolet National Forests should encourage Congress to expand wilderness areas.**

**Response:** In the 2004 Forest Plan, the Chequamegon-Nicolet National Forests recommend three areas on the Forests (a total of 15,500 acres) for designation as Wilderness Study Areas. The Chief of the Forest Service will determine whether or not these areas are officially recognized as Wilderness Study Areas (MA 5B). Only Congress can make the decision to designate Wilderness Study Areas as official Wilderness areas (MA 5)

**PC #: 474**

**Public Concern: The Chequamegon-Nicolet National Forests should recommend the Spring Brook area for wilderness designation.**

**Response:** Changes in management prescription allocations have been made between the draft and final versions of the plan based on public comments and other factors. See the “Wilderness” section in Chapter 4 of the final EIS for more information. Based on issues raised during review of the draft documents, 7,800 acre Spring Brook area is a recommended Wilderness Study Area in the 2004 Forest Plan.

**PC #: 350**

**Public Concern: The Final EIS should include an analysis justifying the need for more wilderness area recommendations.**

**Response:** The need for additional Wilderness is established in two primary locations: 1) FSH 1909.12, Chapter 7 (Wilderness Evaluation), which addresses the formal criteria for determining need for Wilderness, and 2) the Analysis of the Management Situation (AMS) for Wilderness and Semi-Primitive Non-Motorized (SPNM) Areas, which identifies the need to adjust the Forests’ management direction for Wilderness and SPNM. Both are described in detail in Appendix C of the FEIS.

**PC #: 475**

**Public Concern: The Chequamegon-Nicolet National Forests should recommend the undisturbed portions of the proposed Porcupine Wilderness expansion for wilderness designation.**

**PC #: 82**

**Public Concern: The Chequamegon-Nicolet National Forests should not recommend the area south of Snowmobile Trail 15 for wilderness designation.**

**PC #: 89**

**Public Concern: The Chequamegon-Nicolet National Forests should recommend the area north of Snowmobile Trail 15 for wilderness designation.**

**Response:** Approximately 1,400 acres of the Porcupine Addition to the north and east of Bayfield County Snowmobile Trail #15 have been recommended as Wilderness Study Areas in the 2004 Forest Plan. Although some parts of the Porcupine Addition have been subject to recent harvest (a total of 43 acres has undergone a regeneration harvest during the past ten years), these areas will be allowed to revegetate naturally and follow the course of natural forest development.



**PC #: 341**

**Public Concern: The Chequamegon-Nicolet National Forests should examine the compatibility of adjacent lands when recommending potential wilderness areas.**

**Response:** The authority for studying and designating Wilderness is contained in the Wilderness Act of 1964 and the Eastern Wilderness Act of 1975 (FSM 1923.01). The Code of Federal Regulations and the Forest Service Manual stipulate the requirements for evaluation and designation of Wilderness, outlining the areas to be considered during evaluation, including the extent to which non-Wilderness lands on the National Forest, other Federal lands, State lands, and private lands other than Wildernesses are likely to provide opportunities for unconfined outdoor recreation experiences (FSH 1909.12, Chapter 7 – Wilderness Evaluation). Through use of this policy and regulation, the compatibility of adjacent lands was considered in the recommendation of wilderness study areas.

**PC #: 349**

**Public Concern: The Chequamegon-Nicolet National Forests should return potential wilderness areas to multiple use.**

**Response:** The National Forest Management Act Regulations (36 CFR 219.17) require that Roadless Areas within the National Forest System be evaluated and considered for recommendation as potential wilderness during the forest planning process. The 1984 Wisconsin Wilderness Act requires the Forest Service to revisit the Wilderness option when the Forest Plans are revised, while Forest Service Manual 1923.03(2) states that areas recommended for Wilderness study are “not available for any use or activity that may reduce the area’s Wilderness potential.” As a result, recommended Wilderness Study Areas have been designated as Management Area 5B, which provides a wilderness-like experience within a semi-primitive, non-motorized recreation setting.

The 2004 Forest Plan and EIS recommend three areas, totaling 15,500 acres, as Wilderness Study Areas. These areas were recommended based on analysis during preparation of the EIS, internal considerations, and public comments. They meet the three primary criteria to be considered a potential Wilderness as stated in Forest Service Handbook 1909.12. See Appendix C of the FEIS for a detailed explanation of the Wilderness evaluation process.

**PC #: 340**

**Public Concern: The Forest Plan should require facilities and trails located in potential wilderness areas to be consistent with wilderness characteristics.**

**Response:** Any facilities in Recommended Wilderness Study Areas that were present at the time of the Wilderness Evaluation were determined to be consistent with the management prescription for Recommended Wilderness (MA 5B). (See Appendix C of the FEIS for more information about the Roadless Area Inventory and Wilderness Evaluation.) Such facilities are likely to remain in place until the area is granted formal Wilderness designation and may remain in place indefinitely if found to be compatible with the management direction for designated Wilderness.

According to forestwide guidelines, consideration of the compatibility of trail construction with the management direction for Recommended Wilderness Study Areas (MA 5B) is inherent in the project-level decision-making process. (See Chapter 2 of the Final Plan; “Recreation Facilities and Access Management.”) Specific criteria for the

design, construction, and maintenance of trails within Wilderness Study Areas, therefore, are site-specific decisions outside the scope of the 2004 Forest Plan.

**PC #: 90**

**Public Concern: The Chequamegon-Nicolet National Forests should not recommend Stony Creek for wilderness designation.**

**Response:** Changes in management prescription allocations have been made between the draft and final versions of the plan based on public comments and other factors. In the 2004 Forest Plan, Stony Creek is not designated as a Recommended Wilderness Study Area. See the “Wilderness” section in Chapter 4 of the 2004 Forest Plan for more information.

**PC #: 347**

**Public Concern: The Chequamegon-Nicolet National Forests should not recommend the Porcupine Lake roadless addition for wilderness designation.**

**Response:** Because of its proximity to the existing Porcupine Lake Wilderness, outstanding recreational resources, and exceptional ecological features, the Porcupine Lake Addition is designated as a Recommended Wilderness Study Area (MA 5B) in the 2004 Forest Plan. However, in response to public comment, the southeastern boundary of the area was moved to the northeast side of an existing snowmobile trail.

**PC #: 346**

**Public Concern: The Chequamegon-Nicolet National Forests should not recommend Flynn Lake for wilderness designation.**

**Response:** Because of its proximity to the existing Rainbow Lake Wilderness, outstanding recreation resources, and its value as part of the largest landscape-level northern hardwood patches remaining on the Chequamegon-Nicolet, the Flynn Lake area is designated as MA 5B (Recommended Wilderness Study Area) in the 2004 Forest Plan. In Alternative 1—the “no action” alternative—Flynn Lake is designated as MA 6, Semi-Primitive Non-Motorized.

**PC #: 345**

**Public Concern: The Chequamegon-Nicolet National Forests should not recommend Hungry Run and Flynn Lake for wilderness designation.**

**Response:** Internal and external review led to several changes in wilderness study area designation between the draft and final versions of the Forest Plan. In the 2004 Forest Plan, the Flynn Lake area is designated as Recommended Wilderness Study Area (MA 5B) because of its proximity to the existing Rainbow Lake Wilderness, outstanding recreation resources, and its value as part of the largest landscape-level northern hardwood patches remaining on the Chequamegon-Nicolet. Hungry Run, however, is not allocated as a Recommended Wilderness Study Area in the 2004 Forest Plan. However, a substantial portion of Hungry Run is designated as either a wild and scenic river corridor (MA 8D), research natural area (MA 8E), special management area (MA 8F), or old growth and natural feature complexes (MA 8G). All of these management prescriptions will enhance or maintain the distinctive natural qualities of the Hungry Run area.

**PC #: 93**

**Public Concern: The Chequamegon-Nicolet National Forests should recommend all RARE II areas for wilderness designation.**

**PC #: 95**

**Public Concern: The Chequamegon-Nicolet National Forests should recommend Flynn Lake and St. Peter's Dome for wilderness designation.**

**Response:** None of the RARE II areas fully met the criteria for consideration in the Wilderness Evaluation of the Roadless Area Conservation Rule Final Environmental Impact Statement. However, two of the RARE II areas, Flynn Lake and St. Peter's Dome, had characteristics that were notable enough for them to be considered in the Wilderness evaluation process by exception. Flynn Lake is the only RARE II area that is identified as a Recommended Wilderness Study Area (MA 5B) in the 2004 Forest Plan. St. Peter's Dome is identified as a Semi-Primitive Non-Motorized Area (MA 6A) in the 2004 Forest Plan.

**PC #: 351**

**Public Concern: The Chequamegon-Nicolet National Forests should recommend the Mud Lake roadless area for wilderness designation.**

**Response:** Mud Lake was considered for designation as a Recommended Wilderness Study Area in Alternatives 4 and 7 and is allocated as Management Area 2A in the 2004 Forest Plan. It is important to remember that evaluation of the relative merits of each alternative does not turn upon consideration of a single factor or forest activity, such as designation of Mud Lake as a Recommended Wilderness Study Area, but must rather consider the costs and benefits of the alternative as a whole. The 2004 Forest Plan incorporates aspects of different alternatives (particularly Alternative 5) in order to maximize net public benefits, remain consistent with resource integration and management requirements, and comply with stated goals and objectives.

**PC #: 480**

**Public Concern: The Forest Plan should use designated wilderness areas as a base to expand 5B, 6A, and 6B Management Areas.**

**Response:** Where it is appropriate, Management Areas 5B, 6A and 6B have been allocated adjacent to existing Wilderness. Management Areas 8E, 8F and 8G adjacent to existing Wilderness minimize or prohibit motorized use. See the Selected Alternative Maps for additional information.

**PC #: 91**

**Public Concern: The Chequamegon-Nicolet National Forests should not encourage Congress to expand wilderness areas.**

**PC #: 339**

**Public Concern: The Forest Plan should clarify how recommended wilderness areas will be managed in the absence of congressional action.**

**Response:** The National Forest Management Act regulations (36 CFR 219.17) require that Roadless Areas within the National Forest System be evaluated and considered for recommendation as potential wilderness during the forest planning process. The 1984 Wisconsin Wilderness Act requires the Forest Service to revisit the Wilderness option when the Forest Plans are revised, while Forest Service Manual 1923.03(2) states that areas recommended for Wilderness study will not be "available for any use or activity that may reduce the area's Wilderness potential". Management Area 5B (Recommended

Wilderness Study Areas) provides a wilderness-like experience within a semi-primitive, non-motorized recreation setting. In the absence of Congressional designation as a Wilderness area, Wilderness Study Areas will continue to be managed under the MA 5B management prescription.

The 2004 Forest Plan and EIS recommend three areas, totaling 15,500 acres, as Wilderness Study Areas. These areas were recommended based on analysis during preparation of the FEIS, internal considerations, and public comments. They meet the three primary criteria to be considered a potential Wilderness as stated in Forest Service Handbook 1909.12. Please refer to Appendix C of the FEIS, which explains the entire process in detail.

**PC #: 478**

**Public Concern: The Forest Plan should devote more acreage to wilderness and semi-primitive non-motorized (SPNM) areas.**

**Response:** A wide range of Wilderness and SPNM areas were included in alternatives considered in detail in the FEIS. Combined acreage of Wilderness, recommended Wilderness Study Areas, and SPNM designation ranged from 113,000 acres to 275,000 acres across all alternatives. The 2004 Plan and Selected Alternative include approximately the same acreage of SPNM, Wilderness, and recommended areas for Wilderness study as the Preferred Alternative (Alternative 5), approximately 128,000 acres. Management area allocations and activities in the 2004 Forest Plan are thought to provide the best balance of outputs and services, meet the intent of various laws, and address issues and concerns specific to the management of the Chequamegon-Nicolet National Forests identified in public concerns.

**PC #: 88**

**Public Concern: The Forest Plan should provide for the restoration of the Rainbow Lakes Wilderness.**

**Response:** Management Area 5 emphasizes the management and protection of congressionally designated Wilderness like Rainbow Lake. Natural ecological processes and disturbance regimes determine the course of forest development. Restoration of past management activities will proceed naturally. See Chapter 3 (Management Area Direction) of the 2004 Forest Plan for additional information.

## **National Scenic Trails**

**PC #: 354**

**Public Concern: The Final EIS should include detailed information on the Ice Age and North Country National Scenic Trails.**

**Response:** Detailed information about the Ice Age and North Country National Scenic Trails is included in the “National Scenic and Recreation Trails” section of Chapter 3 of the FEIS. The trails are also clearly shown on maps for the Selected Alternative in the FEIS Map Set.

**PC #: 355**

**Public Concern: The Forest Plan should include provisions to protect the North Country Trail.**

**PC #: 741**

**Public Concern: The Chequamegon-Nicolet National Forests should modify Alternative 3 to protect the Ice Age and North Country Trail corridors.**

**PC #: 97**

**Public Concern: The Forest Plan should include provisions protecting the Ice Age National Scenic Trail.**

**Response:** As described in the “National Scenic and Recreation Trails” section of Chapter 3 of the FEIS, the 2004 Forest Plan offers more specific management direction for the Ice Age and North Country National Scenic Trails than the 1986 Chequamegon Forest Plan and will ensure a quality semi-primitive experience along the lengths of the trails. In the 2004 Forest Plan, both trails are designated as High Scenic Integrity Objectives (SIO) under the Scenery Management System (SMS). This designation will ensure that visible evidence of active vegetation management along the trails will be minimal. In addition to the SMS, approximately ten miles of the Ice Age National Scenic Trail and 29 miles of the North Country National Scenic Trail will pass through management areas that place further restrictions on vegetation management activities and emphasize the enhancement of distinctive natural or recreational features encountered along the trails. These management areas include wilderness, potential wilderness study areas, semi-primitive non-motorized, research natural areas, special management areas, old growth, and wild, scenic, and recreational river corridors.

**PC #: 98**

**Public Concern: The Forest Plan should allow mountain biking on the North Country National Scenic Trail.**

**Response:** Because management of the North Country trail was not identified as a major problem to be addressed during forest plan revision, management is not expected to change considerably under the 2004 Forest Plan. As in the past, the North Country trail will be managed primarily for hiking and backpacking. The National Park Service, which is responsible for overall administration of the North Country, also identifies hiking and backpacking as the major uses of the trail. In addition, public comments received on the proposed Forest Plan and DEIS generally support the continued emphasis on foot travel on National Scenic Trails.

## Lake Designations

**PC #: 358**

**Public Concern: The Chequamegon-Nicolet National Forests should implement a new designation to protect lakes outside of wilderness areas.**

**PC #: 615**

**Public Concern: The Forest Plan should protect lakes and lakeshore habitats with a "Wild Lake" designation.**

**Response:** The 2004 Forest Plan provides programmatic direction for lake access through forestwide standards, guidelines, and objectives. There will be no net increase in the number of lakes with roaded access and some existing unsurfaced access roads, especially to lakes with documented RFSS sites, will be closed. The plan also provides

for 4,280 lake acres within designated non-motorized areas (Management Areas 5, 5B, 6A, 6B, and NM). This is a 2,582 acre increase over the current condition.

The Forests do not have the authority to set special regulations on lakes; this falls under the jurisdiction of the Wisconsin Department of Natural Resources. Direction is provided in the 2004 Forest Plan for cooperating with the WDNR on the management of fish and wildlife species.

In the 2004 Forest Plan, guidance for the restoration of native species is specifically addressed in the Watershed and Aquatic Resource Management Prescription under Aquatic Communities. It directs the Forests to work with the WDNR to restore native communities.

**PC #: 434**

**Public Concern: The Forest Plan should include provisions that further protect Lake Eleven.**

**Response:** Decisions regarding access to individual lakes would be better made at the site-specific project level. Public input would be solicited in the decision-making process.

The 2004 Forest Plan provides programmatic direction for lake access issues through standards and guidelines under recreation. The plan also provides 4,280 lake acres within designated non-motorized areas (Management Areas 5, 5B, 6A, 6B, and NM). This is a 2,582 acre increase over the current condition.

**PC #: 361**

**Public Concern: The Forest Plan should protect the Hay Lake area.**

**Response:** Hay Lake currently has a carry-in type boat access. Decisions regarding changes in access to individual lakes would be better made at the site-specific project level. Public input would be solicited in the decision-making process.

The 2004 Forest Plan provides programmatic direction for lake access issues through standards and guidelines under recreation. The plan also provides 4,280 lake acres within designated non-motorized areas (Management Areas 5, 5B, 6A, 6B, and NM). This is a 2,582 acre increase over the current condition.

## **Semi-Primitive Non-Motorized Areas**

**PC #: 194**

**Public Concern: The Forest Plan should eliminate Management Areas 6A and 6B.**

**PC #: 99**

**Public Concern: The Forest Plan should expand non-motorized areas.**

**PC #: 365**

**Public Concern: The Forest Plan should reduce proposed allocations to semi-primitive non-motorized management.**

**Response:** One purpose of Semi-Primitive Non-Motorized areas and Wilderness is to provide visitors with a remote experience free from the presence and sounds of motorized vehicles. As the population of the country increases, areas where recreationists can experience solitude and remoteness are becoming increasingly rare. The Chequamegon-Nicolet National Forests are among few places in Wisconsin with a land area large enough to provide some seclusion for quality non-motorized experiences.



The Selected Alternative in the FEIS represents what the Forests' managers believe to be the best balance of outputs and services that will achieve sustainable ecosystems, meet the intent of various laws (including multiple use management), and address the issues and concerns specific to the management of the Forests that were identified in public comments.

**PC #: 473**

**Public Concern: The Forest Plan should designate Beaver Lake a semi-primitive non-motorized area.**

**Response:** In the Preferred Alternative the Beaver Lake area was identified as MA 2B-6B: Northern Hardwoods Interior Forest, Semi-Primitive Non-Motorized. However, in the 2004 Forest Plan, Beaver Lake is not designated as a non-motorized area. Maintaining motorized access in the Beaver Lake area will provide opportunities to relocate existing motorized trails from more sensitive areas nearby. The Beaver Lake area lies south of the St. Peters Dome Management Area and could be utilized in the future if motorized trails in the St. Peter's Dome area are relocated. See Appendix Q of the FEIS Appendices for potential motorized trail relocations due to this and other non-motorized designations.

**PC #: 488**

**Public Concern: The Forest Plan should not designate the Rock Lake Area, the Rock Lake II Area, or the area west of Clam Lake, as semi-primitive non-motorized.**

**Response:** In the 2004 Forest Plan, the Rock Lake Non-Motorized Area and the area east of Rock Lake (Rock Lake II) are identified as Semi-Primitive Non-Motorized areas, MA 6A and MA 6B respectively. Forestwide Standards (see Chapter 2 of Final Plan; Social-Recreation Programs) require the Forests to coordinate with local communities to relocate ATV or Snowmobile trails outside of non-motorized areas when reasonable alternative locations are available.

**PC #: 469**

**Public Concern: The Forest Plan should designate Eight Lakes Area a semi-primitive non-motorized area.**

**Response:** The Eight Lakes Area was identified as a Semi-Primitive Non-Motorized Area (MA 6A and 6B) in Alternatives 3, 4, 6, and 7. However, the Eight Lakes Area is identified as a Management Area 2C (Uneven-Aged Northern Hardwoods: Hardwood Early Successional) in Alternatives 2, 5, and the Selected Alternative. The 2004 Forest Plan incorporates aspects of different alternatives (particularly Alternative 5) that best combine to maximize net public benefits, remain consistent with resource integration and management requirements, and comply with stated goals and objectives.

**PC #: 468**

**Public Concern: The Forest Plan should designate the Marengo River Area as a 6B non-motorized area.**

**Response:** The Marengo Area, designated as non-motorized under the 1986 Chequamegon Plan, abounds with hilly topography, scenic views, and mid to late successional northern hardwoods. The area also features Special Management Areas (MA 8F), Old Growth and Natural Feature Complexes (MA 8G), a class I trout stream, and a segment of the North Country National Scenic Trail. Because of these characteristics, the

Marengo Non-Motorized Area was identified as Management Area 6A (Semi-Primitive Non-Motorized, Low Disturbance) in Alternatives 3, 4, 7, and the Selected Alternative.

**PC #: 433**

**Public Concern: The Final EIS should clarify and improve analysis justifying semi-primitive non-motorized area designations.**

**Response:** The Recreation Opportunity Spectrum (ROS) criteria were used as a guide when establishing potential new semi-primitive non-motorized (SPNM) areas. See the “Recreation Opportunity Spectrum Descriptions and Inventory” section in Chapter 3 of the FEIS for more information about SPNM areas. For the most part, the national ROS criteria and the Forests’ criteria are the same. However, the Forests’ criteria define the distance potential SPNM core areas must be from “better than primitive roads” while the national criteria say from “all roads”. The Forests adjusted this criteria because: 1) most of the primitive roads are low use; 2) these roads could be closed and obliterated relatively easily during the planning cycle; 3) the thick vegetation provides a good site and sound screen to buffer any roads before they are closed; and 4) primitive roads existed in all of the current SPNM and Wilderness areas before they were designated.

**PC #: 443**

**Public Concern: The Forest Plan should include vegetative management guidelines for Management Area 6A consistent with the overall direction for 6A areas.**

**Response:** Timber harvesting is not normally allowed in Management Area 6A, resulting in a natural appearing semi-primitive non-motorized setting. Harvest may be permitted on rare occasions, which are specified in the guidelines.

**PC #: 377**

**Public Concern: The Final EIS should clarify what comprises the third category of semi-primitive non-motorized management areas.**

**Response:** It was not our intent to mislead the public about the total acreage of Semi-Primitive Non-Motorized (MA 6A and 6B) areas and Non-Motorized with full vegetation management (NM) areas. Comments and concerns were taken into consideration in the formulation of the Selected Alternative and were used by forest specialists to revise and improve the EIS and forest plan between draft and final versions. The effects analysis for “Semi-Primitive Non-Motorized” has been clarified in Chapter 3 of the FEIS.

**PC #: 380**

**Public Concern: The Forest Plan should expand and restore the Kidrick Swamp Area.**

**Response:** In the 2004 Forest Plan much of the Kidrick Swamp area is identified as Management Area 8E, Research Natural Area. This designation will protect the values for which the area was established. Although the Kidrick Swamp area will not be closed to motorized vehicles, new road or motorized trail construction is prohibited in Research Natural Areas.

**PC #: 376**

**Public Concern: The Forest Plan should retain the Rock Lake unit as a 6A semi-primitive non-motorized management area.**

**Response:** In the Selected Alternative and 2004 Forest Plan, the Rock Lake area is identified as Semi-Primitive Non-Motorized, Low Disturbance (MA 6A).

**PC #: 400**

**Public Concern: The Forest Plan should redraw the Big Brook semi-primitive non-motorized area to run north-south into the Bearsdale region.**

**Response:** Forest Road 218 (Maintenance Level 3) forms the northern boundary of the Big Brook Semi-Primitive Non-Motorized (SPNM) area. The presence of the road and privately-owned land north of the Big Brook area limit the potential for expanding the SPNM to include the Bearsdale region.

**PC #: 368**

**Public Concern: The Forest Plan should expand the current Elk River and Little Willow River Drumlins semi-primitive non-motorized management areas.**

**Response:** The Recreation Opportunity Spectrum (ROS) criteria were used as a guide when establishing potential new semi-primitive non-motorized (SPNM) areas. The Forests considered both physical attributes and recreation quality factors when identifying new SPNM areas. See the “Transportation and Open Road Density” section in Chapter 3 of the FEIS for more information about SPNM areas.

The area north of Elk River and Little Willow River Drumlins did not meet the criteria for SPNM designation. In the Selected Alternative and 2004 Forest Plan, this area is identified as Management Area 2A (Uneven-Aged Northern Hardwoods) with inclusions of Management Area 8F (Special Management Area) and Management Area 8E (Research Natural Area.)

**PC #: 364**

**Public Concern: The Forest Plan should retain and expand the Ice Age Scenic Trail area currently designated as a semi-primitive non-motorized management area.**

**Response:** The Recreation Opportunity Spectrum (ROS) was used to zone recreation opportunities on the Forests. The semi-primitive non-motorized (SPNM) ROS classification was applied to parts of the Forests at least 2,500 acres in size (some exceptions) with a predominately natural setting, high probability of experiencing isolation, and little or no evidence of primitive roads. Because of the history of intensive vegetation management in the Ice Age unit, a designation of Non-Motorized with Full Vegetation Management was determined to be a more appropriate designation for the area than SPNM. Likewise, ecological and recreational factors limit the suitability of many areas in the vicinity of the Ice Age Non-Motorized area for the SPNM designation.

**PC #: 360**

**Public Concern: The Forest Plan should designate the Kidrick block as a semi-primitive non-motorized management area, and area wetlands as a Scientific Natural Area.**

**Response:** The Recreation Opportunity Spectrum was used to zone recreation opportunities on the Forests. The semi-primitive non-motorized (SPNM) classification was applied to parts of the Forests at least 2,500 acres in size (some exceptions) with a predominately natural setting, high probability of experiencing isolation, and little or no evidence of primitive roads. The Kidrick Swamp area did not meet the minimum Recreation Opportunity Spectrum criteria for semi-primitive non-motorized as described in the “Transportation and Open Road Density” section in Chapter 3 of the FEIS. However, much of the Kidrick Swamp block is designated as a Research Natural Area (RNA; MA 8E) in the Selected Alternative, a management prescription that will effectively protect the ecologically significant natural features of the area. Although the

area will not be closed to motorized vehicles, no new roads or motorized trails will be constructed within the RNA.

**PC #: 382**

**Public Concern: The Forest Plan should designate the area north of Archibald Lake as Management Area 6B.**

**Response:** The Recreation Opportunity Spectrum was used to zone recreation opportunities on the Forests. The semi-primitive non-motorized (SPNM) classification was applied to parts of the Forests at least 2,500 acres in size (some exceptions) with a predominately natural setting, high probability of experiencing isolation, and little or no evidence of primitive roads. The Archibald Lake area did not meet the minimum Recreation Opportunity Spectrum criteria for semi-primitive non-motorized as described in the “Transportation and Open Road Density” section in Chapter 3 of the FEIS. However, much of the area north of Archibald Lake (bounded by CTH T, STH 32, and FR 2121) is designated as a Special Management Area (SMA; MA 8F) in the Selected Alternative. Although this management prescription will not close the area to motorized vehicles, it will close the area to timber management activities (except on rare occasions) and prohibit or limit construction of new motorized trails or roads, effectively protecting the values for which the area was established.

**PC #: 374**

**Public Concern: The Forest Plan should designate the Carter Hills area as a semi-primitive non-motorized management area.**

**Response:** The Recreation Opportunity Spectrum was used to zone recreation opportunities on the Forests. The semi-primitive non-motorized (SPNM) classification was applied to parts of the Forests at least 2,500 acres in size (some exceptions) with a predominately natural setting, high probability of experiencing isolation, and little or no evidence of primitive roads. Based on the evaluation criteria, an ROS classification of Roaded Natural or Rural was a more appropriate designation for the Carter Hills area than SPNM. See the “Transportation and Open Road Density” section in Chapter 3 of the FEIS for more information about forest zoning under Recreation Opportunity Spectrum.

**PC #: 373**

**Public Concern: The Forest Plan should designate the Diamond Roof block and Hiwanka Lakes complex as a semi-primitive non-motorized management area.**

**Response:** The Recreation Opportunity Spectrum was used to zone recreation opportunities on the Forests. The semi-primitive non-motorized (SPNM) classification was applied to parts of the Forests at least 2,500 acres in size (some exceptions) with a predominately natural setting, high probability of experiencing isolation, and little or no evidence of primitive roads. Based on the evaluation criteria, an ROS classification of Semi-Primitive Motorized (SPM) was a more appropriate designation for the Diamond Roof block and Hiwanka Lakes complex than SPNM. Much of this area, however, is designated as either Old Growth and Natural Feature Complexes (MA 8G) or Special Management Area (MA 8F) in the Selected Alternative—both management prescriptions that will protect the values for which the area was established. See the “Transportation and Open Road Density” section in Chapter 3 of the FEIS for more information about forest zoning under the Recreation Opportunity Spectrum.

**PC #: 366**

**Public Concern: The Forest Plan should designate the Popple River headwater region as a semi-primitive non-motorized management area.**

**Response:** The Recreation Opportunity Spectrum was used to zone recreation opportunities on the Forests. The semi-primitive non-motorized (SPNM) classification was applied to parts of the Forests at least 2,500 acres in size (some exceptions) with a predominately natural setting, high probability of experiencing isolation, and little or no evidence of primitive roads. Based on the evaluation criteria and the management objectives of the Selected Alternative, an ROS classification of Semi-Primitive Motorized or Roaded Natural Remote (2.0 mi/sq mi open road density) was determined to be a more appropriate designation for the Popple River headwaters region than SPNM. See the “Transportation and Open Road Density” section in Chapter 3 of the FEIS for more information about forest zoning under the Recreation Opportunity Spectrum.

**PC #: 404**

**Public Concern: The Forest Plan should designate a portion of the Moquah Barrens area or Bladder Lake as a semi-primitive non-motorized management area.**

**Response:** The Recreation Opportunity Spectrum (ROS) criteria were used as a guide when establishing potential new semi-primitive non-motorized (SPNM) areas. See the “Transportation and Open Road Density” section in Chapter 3 of the FEIS for more information about the ROS classification system. The road density in the Moquah Barrens and Bladder Lake Areas did not meet the ROS remoteness criteria for SPNM areas. In addition, the type of management needed to maintain the Pine Barrens community was determined to be incompatible with a non-motorized designation because of the reliance on prescribed burning that requires somewhat intensive treatments to fulfill safe fire management requirements. For these reasons, Moquah Barrens and Bladder Lake were not considered for Semi-Primitive Non-Motorized designation in any of the alternatives. In the 2004 Forest Plan, Moquah Barrens is identified as Management Area (MA) 8C, a unique management prescription developed to enhance the unique character of the area. Bladder Lake is identified as MA 3C (Even-Aged Hardwoods: Oak-Aspen).

**PC #: 367**

**Public Concern: The Forest Plan should designate the Foulds Creek Block as a semi-primitive non-motorized management area.**

**Response:** The Foulds Creek and Bootjack Conifers areas are designated, respectively, as a Research Natural Area (RNA; MA 8E) and as Old Growth and Natural Feature Complexes (MA 8G) in Alternatives 2-9 and the Selected Alternative. Neither area met the minimum criteria for semi-primitive non-motorized areas (see the “Transportation and Open Road Density” section of Chapter 3 of the FEIS for more information). Designation as a Research Natural Area or Old Growth and Natural Feature Complexes will protect the values for which the areas were established by closing the areas to timber management activities (except on rare occasions; see Chapter 3 of the Forest Plan for more information) and prohibiting or limiting construction of new motorized trails or roads.

**PC #: 369**

**Public Concern: The Forest Plan should designate the Brunsweler River corridor as a semi-primitive non-motorized management area.**

**Response:** The Forests analyzed a wide range of alternatives that contained a variety of management area prescriptions for the Forests. In the 2004 Forest Plan, the Brunsweler River corridor is identified as a semi-primitive non-motorized (MA 6B) area with an Uneven-Aged Northern Hardwoods emphasis (2A). However, due to public comments, the overall total Forest area mapped as Uneven-Aged Northern Hardwoods: Interior Forest (MA 2B) has increased by over 79, 000 acres.

**PC #: 385**

**Public Concern: The Forest Plan should designate the Wabasso Lake area as a 6A semi-primitive non-motorized management area, as proposed.**

**Response:** In the 2004 Forest Plan, the Wabasso Lake area is identified as Semi-Primitive Non-Motorized, Low Disturbance (MA 6A).

**PC #: 371**

**Public Concern: The Forest Plan should designate the area west of Highway GG and south of Forest Road 172 as a 6A semi-primitive non-motorized management area.**

**Response:** This area is designated as a Research Natural Area (RNA; MA 8E) and Old Growth and Natural Feature Complex (MA 8G) in Alternatives 2-9 and the Selected Alternative. Designation as MA 8E and 8G will protect the values for which the areas were established by closing the areas to timber management activities (except on rare occasions; see Chapter 3 of the Final Forest Plan) and prohibiting/limiting construction of new motorized trails or roads.

**PC #: 389**

**Public Concern: The Forest Plan should split the management area of Lauterman Lake and Keiper Creek and designate the eastern portion as a 6A semi-primitive non-motorized management area.**

**Response:** Lauterman Lake is designated as a Special Management Area (MA 8F) and Keiper Creek is designated as a Special Management Area and an Old Growth & Natural Feature Complex (MA 8G) area. These designations will protect the values for which the areas were established by closing the areas to timber management activities (except on rare occasions; see Chapter 3 of the Final Forest Plan) and prohibiting/limiting construction of new motorized trails or roads.

**PC #: 375**

**Public Concern: The Forest Plan should designate the Hellhole Creek and Iron River blocks as 6B semi-primitive non-motorized management areas.**

**Response:** The Recreation Opportunity Spectrum (ROS) criteria were used as a guide when establishing potential new semi-primitive non-motorized (SPNM) areas. The Forests considered both physical attributes and recreation quality factors when identifying new SPNM areas. See the "Transportation and Open Road Density" section in Chapter 3 of the FEIS for more information about SPNM areas.

The Hellhole Creek and Iron River blocks did not meet the criteria for SPNM designation. In the 2004 Forest Plan, the Hellhole Creek Block (polygon 38 and 43) is mapped as Uneven-Aged Northern Hardwoods: Interior Forest (MA 2B) with an inclusion of Old Growth (MA 8G), and Early Successional Aspen (MA 1A). The Iron



River area is mapped as Uneven-Aged Northern Hardwoods: Hardwood-Early Successional (MA 2C) with an inclusion of Old Growth & Natural Feature Complexes (MA 8G).

**PC #: 372**

**Public Concern: The Forest Plan should designate the Mondeaux County East Hardwoods area as a 6B semi-primitive non-motorized management area.**

**Response:** The Mondeaux/County E Hardwoods areas are mapped as a Special Management Area (SMA; MA 8F) and a Research Natural Area (RNA; MA 8E) in the 2004 Forest Plan. These designations will protect the values for which the areas were established. Although the area will not be closed to motorized vehicles, new road or motorized trail construction is prohibited or limited in Special Management Areas and Research Natural Areas (see Chapter 3 of the Forest Plan.) Horses, bicycles, and motorized vehicles are prohibited on RNA trails while motorized trail use is prohibited in SMAs when it interferes with SMA objectives.

**PC #: 370**

**Public Concern: The Forest Plan should designate the Hungry Run as a 6B semi-primitive non-motorized management area, instead of recommending it for wilderness designation**

**Response:** Comments and concerns were taken into consideration in the formulation of the Selected Alternative and were used by forest specialists to revise and improve the EIS and forest plan between draft and final versions. The Selected Alternative incorporates aspects of different alternatives (particularly Alternative 5) that best combine to maximize net public benefits, remain consistent with resource integration and management requirements, and comply with stated goals and objectives. In the 2004 Forest Plan, Hungry Run is mapped as an MA 2B (Uneven-Aged Northern Hardwoods: Interior Forest) with inclusions of Research Natural Area (MA 8E), Special Management Area (MA 8F) and Old Growth & Natural Feature Complexes (MA 8G).

**PC #: 403**

**Public Concern: The Forest Plan should designate the area south of the Pine River corridor as Management Area 6B-2B.**

**Response:** The Forest analyzed a wide range of alternatives that contained a variety of management area prescriptions for the Forests. In the Selected Alternative, the area south of the Pine River corridor is identified as Uneven-Aged Northern Hardwoods: Interior Forest (MA 2B) with inclusions of Old Growth & Natural Feature Complexes (MA 8G) and Special Management Area (MA 8F). The 2004 Forest Plan incorporates aspects of different alternatives (particularly Alternative 5) that best combine to maximize net public benefits, remain consistent with resource integration and management requirements, and comply with stated goals and objectives.

## Wild and Scenic Rivers

**PC #: 495**

**Public Concern:** The Forest Plan should include Wild and Scenic River recommendations.

**PC #: 611**

**Public Concern:** The Forest Plan should broaden the number of rivers being studied for Wild and Scenic River designation.

**PC #: 492**

**Public Concern:** The Chequamegon-Nicolet National Forests should move FS Road 2183 to make the Peshtigo River eligible for designation as a Wild and Scenic River.

**PC #: 387**

**Public Concern:** The Chequamegon-Nicolet National Forests should recommend the Popple, Pine Peshtigo, Chippewa, and Flambeau Rivers for Wild, Scenic, and Recreational River designation.

**PC #: 408**

**Public Concern:** The Chequamegon-Nicolet National Forests should conduct suitability analyses on the East Fork of the Chippewa, South Fork of the Flambeau, Pine, Popple, and Peshtigo rivers to determine whether special designations are warranted and appropriate.

**Response:** Wild and Scenic River recommendations were identified in the Notice of Intent to Prepare an Environmental Impact Statement (June 1996) as an area where little or no change is warranted. The entire Wild and Scenic River Eligibility Report can be found in Appendix E of the FEIS.

Under the 2004 Forest Plan, rivers considered eligible for Wild and Scenic River designations will continue to be protected to maintain their qualities; Standards and Guidelines have been established to provide protection to potentially eligible river segments and designated and eligible river segments. Table 3-13 in Chapter 3 of the 2004 Forest Plan contains a list of potential classifications for eligible national wild, scenic and recreational river segments, designated National Wild/Scenic River segments, and rivers that are yet to be studied for eligibility.

**PC #: 614**

**Public Concern:** The Forest Plan should protect eligible Wild and Scenic Rivers from the adverse effects of ATVs.

**Response:** Management Area Standards and Guidelines for existing, eligible, and potentially eligible Wild, Scenic, and Recreational Rivers (Management Area 8D) provide direction for motorized trail use on or near these river segments. See Chapter 3 of the 2004 Forest Plan for more specific information.

## Special Management Areas

**PC #: 498**

**Public Concern:** The Forest Plan should not utilize Management Areas 8E, 8F, and 8G, inasmuch as they are an illegal de facto designation of wilderness.

**Response:** Recommended Wilderness Study Areas (MA 5B) were selected to fulfill a different role and were developed using different criteria than those used to identify

Management Areas 8E, 8F and 8G (See Appendix C for more detail). For instance, Recommended Wilderness Study Areas are at least 5,000 acres in size unless they are adjacent to existing Wilderness. Patches of Management Areas 8E, 8F, and 8G range from 3 to 4,800 acres in the Selected Alternative, overall. On upland acres, they range from 3 to 2,700 acres in size.

Recommended Wilderness Study Areas are managed for recreational and ecological values. Evidence of human activity is low. Timber harvest is prohibited, and any existing forest openings will not be maintained. Access is restricted to non-motorized uses with few exceptions. No motorized vehicles or mechanized equipment are allowed in designated Wilderness.

Management Area 8E areas, Existing and Candidate Research Natural Areas, are part of a national network of areas that display ecologically significant natural features, representative ecosystems, or unique characteristics such as rare vegetation communities. In general, existing roads remain in use around and through these areas. Motorized use of trails is not permitted. Vegetation management, although rare, includes those activities that will maintain the desired vegetation type.

Special Management Areas (MA 8F) have special ecological, historical, or geological characteristics of forestwide or regional significance. Motorized travel is allowed on existing roads or trails designated for that purpose, if they do not damage the characteristics for which the area was designated. Vegetation management and commercial timber harvest will not be permitted unless needed to maintain the character and purpose of the area.

Finally, Old Growth & Natural Feature Complexes (MA 8G) were selected for their old growth and old growth community complex characteristics. Roads and trails exist and are used within these areas. In the 2004 Forest Plan, salvage operations are allowed within MA 8G in some situations.

**PC #: 363**

**Public Concern: The Forest Plan should designate the areas along the Ice Age and North Country National Scenic Trails as Special Management Areas.**

**Response:** As described in the “National Scenic and Recreation Trails” section of Chapter 3 of the FEIS, the 2004 Forest Plan offers more specific management direction for the Ice Age and North Country National Scenic Trails than the 1986 Chequamegon Forest Plan and will ensure a quality semi-primitive experience along the lengths of the trails.

In the 2004 Forest Plan, both trails are designated as High Scenic Integrity Objectives (SIO) under the Scenery Management System (SMS). This designation will ensure that visible evidence of active vegetation management along the trails will be minimal. In addition to the SMS, approximately ten miles of the Ice Age National Scenic Trail and 29 miles of the North Country National Scenic Trail will pass through management areas that place further restrictions on vegetation management activities and emphasize the enhancement of distinctive natural or recreational features encountered along the trails. These management areas include wilderness, potential wilderness, semi-primitive non-motorized, research natural areas, special management areas, old growth, or wild, scenic, and recreational river corridors.

**PC #: 362**

**Public Concern: The Forest Plan should protect all identified ecosystem reference areas.**

**PC #: 410**

**Public Concern: The Forest Plan should designate all candidate research natural areas.**

**Response:** Management Areas 8E (Existing and Candidate Research Natural Areas), 8F (Special Management Areas) and 8G (Old Growth and Natural Feature Complexes) are collectively referred to as Ecological Reference Areas. Some Ecological Reference Areas are also embedded in Wilderness.

MA 8E is characterized by ecologically significant natural features, representative ecosystems, and/or unique areas. MA 8F is characterized by areas of physical, biological, and cultural features of forestwide or regional significance that may also serve as reference sites for research and monitoring. There are approximately 99,000 acres of MA 8E and 8F in the Selected Alternative and 2004 Forest Plan. While Special Management Areas can be designated administratively or by legislation, existing and candidate Research Natural Areas are designated administratively by the Regional Forester.

These designations help provide a balance between competing concerns that Forest Service managers feel best meets the needs of the diverse American public while addressing the issues and concerns specific to the management of the Chequamegon-Nicolet National Forests as identified in public comments.

**PC #: 257**

**Public Concern: The Forest Plan should designate aquatic ecosystem reference areas using the same process used for selecting terrestrial ecosystem reference areas.**

**PC #: 344**

**Public Concern: The Forest Plan should designate a full spectrum of aquatic reference sites as research natural areas.**

**Response:** The 2004 Forest Plan allocates approximately 185,000 acres of ecosystem reference areas (MA 8E, 8F, and 8G). These areas are grouped into ecosystem complexes, which contain terrestrial, wetland, and aquatic ecosystems. The majority of stream types, called valley segments, that are found on the Forests are represented in ecological reference areas. A number of lakes are fully contained within ecological reference areas. Examples include: Wabasso, Cedar, Pond, Rock, Two Axe, Bastille, Lost, and Lauterman Lakes. Some lakes are nearly embedded within ecological reference areas. These include: Northeast, Sugarbush, Big Brook, and Star Lakes. While a detailed assessment of the representation (“gap analysis”) of terrestrial ecosystems has been completed, a similar assessment for aquatic features has not yet been finalized. Although the exact percentage of the Forests’ aquatic ecosystems that will be included in the ecological reference area network is unknown, the majority of lake and stream types will be represented in the network.

Your suggestion is noted and a more specific aquatic ecosystem reference area analysis may be considered in the future. More research and discussion with other governmental entities and individuals must take place before such an idea can be considered for implementation.

**PC #: 359**

**Public Concern: The Forest Plan should establish candidate research natural areas and special management areas.**

**PC #: 352**

**Public Concern: The Chequamegon-Nicolet National Forests should implement the research natural areas program.**

**Response:** Management Areas 8E (Existing and Candidate Research Natural Areas), 8F (Special Management Areas) and 8G (Old Growth and Natural Feature Complexes) are collectively referred to as Ecological Reference Areas. Some Ecological Reference Areas are also embedded in Wilderness.

MA 8E is characterized by ecologically significant natural features, representative ecosystems, and/or unique areas. MA 8F is characterized by areas of physical, biological, and cultural features of forestwide or regional significance that may also serve as reference sites for research and monitoring. There are approximately 99,000 acres of MA 8E and 8F in the Selected Alternative and 2004 Forest Plan. While Special Management Areas can be designated administratively or by legislation, existing and candidate Research Natural Areas are designated administratively by the Regional Forester.

These designations help provide a balance between competing concerns that we feel best meets the needs of the diverse American public while addressing the issues and concerns specific to the management of the Chequamegon-Nicolet National Forests as identified in public comments.

**PC #: 448**

**Public Concern: The Final EIS should justify and clarify old growth and research area designations.**

**Response:** A forest plan is not a research document; it is a programmatic management plan for a National Forest. Research needs could be developed through monitoring and implementation of the forest plan. The establishment of old growth and Research Natural Areas contribute to addressing the revision topic of Biological Diversity, which was one area of Forest management determined to need change as a result of more information about resource conditions, changed resource conditions, new scientific and/or technical information, improved understanding of the results of previous management direction due to monitoring and evaluation, and changes in public perceptions about what constitutes maximum public benefits related to national forests.

**PC #: 356**

**Public Concern: The Final EIS should explain the purpose, acreage, and reasoning behind research natural areas.**

**Response:** Research Natural Areas (RNAs) are selected and established as part of the continuing land and resource management planning process for National Forest System lands (36 CFR 219.25, FSM 1922 and 4063). As the 2004 Forest Plan is implemented, required establishment records will be completed and concurrence with the Director of North Central Research Station will be sought for those Candidate RNAs that are appropriate to be designated as Research Natural Areas.

Appendix N of the FEIS lists all the candidate RNAs by name, site identification number, district, and Landtype Association (LTA). In addition, these sites are included on maps of each alternative found in the map set. Additional information (including size, unique or exemplary natural features, presence of rare species, etc) is provided in the *Landscape*

*Analysis and Design Report* (Parker 2000). This document also describes the rationale for establishing a network of ecological reference areas that includes RNAs.

Forest Service Manual 4063 provides direction for the establishment and management of RNAs. The Forests followed this direction when inventorying and establishing a database of potential RNAs. The National Environmental Policy Act of 1970 requires the Forest Service to study, develop, and describe appropriate alternatives to recommend courses of action (36 CFR 219.25). In addition, the *Draft Eastern Regional Framework for establishing a Network of Representative Ecological Reference Areas* (USDA FS 1996) was a principle tool in the development of the ecological reference area network. A specific report, *RNA Assessment for the Chequamegon-Nicolet National Forest* (Tyrell et al, 1998) was used to help assess the need for additional ecological reference areas on the Forests. Forest Plan revision documents are available to the public as part of the Planning Record.

The alternatives evaluated in the FEIS include a wide range of potential RNA allocations. Efforts were made during the inventory phase to include all CNNF major ecosystem types in the group of potential RNAs. The effects of candidate and existing RNAs on a number of other resources, including timber and recreation, are analyzed in Chapter 3 of the FEIS.

**PC #: 409**

**Public Concern: The Final EIS should include management area codes that distinguish between current and proposed research natural areas.**

**Response:** Management Area direction is the same for both existing and candidate Research Natural Areas (Management Area 8E). The locations of the existing RNAs have not changed and are shown on the map for Alternative 1 that is included in the map packet. Larger scale maps are included in the planning record. Locations of candidate and existing RNAs provided by the 2004 Forest Plan are shown on the “Management Area” map for the Selected Alternative.

## **Natural Resources Management (general)**

**PC #: 167**

**Public Concern: The Chequamegon-Nicolet National Forests should design the Forest Plan to reflect historic ranges of natural variation.**

**Response:** Early plan revision documents such as the Range of Natural Variation (RNV) Assessment, Analysis of the Management Situation for Landscape Pattern, General Assessment on Ecological Sustainability, and the Analysis of the Management Situation for Old Growth contributed to a better understanding of how the current situation on the Forests compares to estimated RNV conditions. Some of this information is highlighted in the FEIS (Chapter 3) in the “Biological Diversity and Ecosystem Components” section.

This information was incorporated into the development of the alternatives in a number of ways. For example, the Alternative Management Areas (MA 2B, 3B, 4B, 4C) all have a desired landscape structure which is more similar to RNV conditions. That is, Alternative Management Areas (AMAs) emphasize large blocks of contiguous habitat and larger than average vegetation patch sizes. Chapter 4 of the *Landscape Analysis and Design Report* (Parker 2000) contains more detailed information on how AMAs can help restore several major ecosystem types that were once very common. Further, the management area guidelines for these AMAs are modeled after the frequency and



intensity of natural disturbance regimes typical of each ecosystem. The 2004 Forest Plan allocates approximately 263,000 acres to AMAs.

Additionally, ecological reference areas (MA 8E, 8F, 8G) are, in part, intended to restore forest age and size class distributions more typical of estimated RNV conditions. The 2004 Forest Plan allocates approximately 185,000 acres of ecological reference areas.

Estimated RNV conditions were also used to evaluate alternatives. For example, the cumulative effects analysis for Vegetation Structure, Function, and Composition (Chapter 3 of the FEIS) discusses which alternatives are moving towards RNV conditions.

**PC #: 87**

**Public Concern: The Forest Plan should not change the current management of the Stony Creek Area.**

**Response:** In the 2004 Forest Plan and EIS, the Stony Creek area is designated as non-motorized with full vegetation management (NM). Under this designation, roads within the perimeter of the Stony Creek area will be closed to public motorized vehicles. However, the existing snowmobile and winter-ATV trail that bisects the area will remain open to the public; although it may be relocated in the future if a reasonable alternative location outside the non-motorized area is identified. No new motorized trails will be created and all off-road/off-trail travel will be prohibited. Vegetation management of the area will emphasize uneven-aged northern hardwoods with a strong emphasis on restoration of interior northern hardwood forest conditions (Management Area 2B).

**PC #: 122**

**Public Concern: The Forest Plan should prioritize recreation.**

**PC #: 168**

**Public Concern: The Forest Plan should prohibit unnatural disturbances.**

**PC #: 116**

**Public Concern: The Forest Plan should prioritize timber production.**

**PC #: 120**

**Public Concern: The Forest Plan should prioritize multiple use.**

**PC #: 114**

**Public Concern: The Forest Plan should prioritize biodiversity.**

**Response:** The Multiple-Use Sustained-Yield Act of 1960 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.” This means that the National Forests are managed to provide for the use of all the various renewable surface resources in a combination that best meets the needs of the American people. The 2004 Forest Plan provides a balance between competing concerns while managing for biological diversity, off-road vehicles, timber harvest, and non-motorized recreation.

**PC #: 689**

**Public Concern: The Forest Plan should manage red pine and white pine stands with an uneven-aged prescription that ensures recruitment of standing snags and downed woody debris.**

**PC #: 172**

**Public Concern: The Forest Plan should increase the restoration levels of natural origin red pine/white pine communities.**

**Response:** Because it is intolerant of shade, red pine does not do well in an uneven-aged situation. To a lesser degree, the same can be said for white pine. The white pine management proposed in the 2004 Forest Plan is a shelterwood system that relies on overhead shade from mature white pine (or other species) while white pine regeneration develops. Overhead protection will be maintained until regeneration is 20-25 feet tall. At that time, the overhead shade is removed to release the understory saplings. While this is technically considered an even-age management technique, it does have many of the characteristics of an uneven-aged system, as trees from several age classes are present for long period of time. Forestwide standards and guidelines provide for the recruitment of snags and coarse woody debris.

The Selected Alternative dedicates 30,000 acres to natural pine-oak (MA 4B) and another 11,000 acres to oak-pine (MA 3B). Both of these management areas provide large block forests on suitable soil types, utilize extended rotation ages, encourage natural regeneration, and emphasize high levels of reserve and snag tree components.

## **Monitoring**

**PC #: 173**

**Public Concern: The Chequamegon-Nicolet National Forests should solicit public comments on the Monitoring and Evaluation Plan being developed to supplement the Forest Plan.**

**Response:** The Annual Monitoring Plan of Operations and subsequent monitoring evaluation reports will be made available to the public. While soliciting public comment would not be required for preparation of administrative documents such as those, preliminary discussions will include a variety of non-Forest Service sources, as well as government to government consultation with tribal entities.

**PC #: 175**

**Public Concern: The Chequamegon-Nicolet National Forests should strengthen the Monitoring and Evaluation Plan.**

**PC #: 178**

**Public Concern: The Forest Plan should clarify how the objectives in the Monitoring and Evaluation Plan will be measured.**

**PC #: 181**

**Public Concern: The Forest Plan should include measurable standards and guidelines for monitoring restoration progress.**

**PC #: 176**

**Public Concern: The Forest Plan should include more quantitative methods to conduct effectiveness and validation monitoring.**

**Response:** The Monitoring and Evaluation Plan (Chapter 4 of the 2004 Forest Plan) is intended to provide a general framework to guide the monitoring and evaluation process. Each year, the Annual Monitoring Plan of Operations will identify specific monitoring questions and the data requirements for addressing these questions. The monitoring questions will address Forest Plan accomplishments and effectiveness. The results of the monitoring activities are compiled annually into a Monitoring Evaluation Report. In that report, the effectiveness of management activities, the validity of the scientific underpinnings of the 2004 Forest Plan, the need for additional research, and the need to amend or revise the 2004 Forest Plan will be assessed.

As is stated in Chapter 4 of the 2004 Forest Plan, both quantitative and qualitative methods will be used in monitoring activities. The Forest Service recognizes that quantitative methods are, in most instances, more useful. However, trade-offs are unavoidable due to the prohibitive cost of quantitative studies.

**PC #: 177**

**Public Concern: The Forest Plan should provide additional categories of effectiveness and validation monitoring for interior northern hardwood patches.**

**Response:** The Annual Monitoring Plan of Operations will define what variables will be measured to assess characteristics of the interior northern hardwoods patches. Monitoring elements considered in the development of that monitoring plan include: 1) the abundance or number of occurrences of rare plant and animal species, 2) deer density, 3) hemlock/cedar/Canada yew regeneration, 4) forest bird abundance/productivity, 5) canopy closure, 6) tree species composition, and 7) snag accumulation.

**PC #: 431**

**Public Concern: The Chequamegon-Nicolet National Forests should utilize tools to monitor and guide forest ecosystem management other than Forest Inventory and Analysis.**

**Response:** During implementation of the 2004 Forest Plan, forest ecosystem management will be monitored in several ways. First, Timber Sale Reviews and Knutsen-Vandenburg Reviews will be used to evaluate whether on-the-ground activities followed those described in the NEPA decisions. Second, Reforestation Surveys of both artificial and natural regeneration will be conducted after timber harvests. Third, the Forests maintain a vegetation database with inventories of all forested and non-forested stands. The database is continually updated with emphasis on stands suited for timber harvest (each stand is visited every 10-15 year). Together with the Forest Inventory and Analysis, these monitoring tools will be used to help guide forest ecosystem management.

**PC #: 180**

**Public Concern: To monitor forest productivity, the Forest Plan should require data collection to assess forest changes due to other influences.**

**Response:** The Forest Service recognizes its responsibility to monitor and evaluate the effects of management prescriptions, including changes in the productivity of the land (36 CFR 219.12 (k) 2). The measurement of forest productivity, as well as the factors that affect it such as insect and disease outbreaks, deer herbivory, and air pollution, will be

considered in the development of the Annual Monitoring Plan of Operations which will be prepared each year during the implementation of the 2004 Forest Plan.

**PC #: 182**

**Public Concern: The Chequamegon-Nicolet National Forests should conduct a study to determine what factors lead to "unacceptable resource damage."**

**Response:** "Unacceptable resource damage" is determined on a case-by-case basis. For example, one instance of driving an ATV through a wetland or ten instances of an ATV driven up a steep hill may both destroy the existing vegetation and destabilize the soil, thus constituting unacceptable resource damage. Monitoring efforts will aid in identifying unacceptable resource damage and adaptive management may be necessary to ameliorate the situation. In the case of ATV impacts on resources, development of the Annual Monitoring Plan of Operations will consider stream sedimentation, spread of non-native invasive species, soil erosion, compaction and rutting, and the incidence of illegal off-trail ATV use as monitoring elements to assess the level of resource damage.

**PC #: 179**

**Public Concern: The Forest Plan should require annual monitoring of ATV use.**

**Response:** The Monitoring and Evaluation Plan in the 2004 Forest Plan identifies the effects of off-road vehicles as a minimum legally required monitoring item. Monitoring will be done annually. Effects of off-road vehicles will also be evaluated, if necessary, during the site-specific project level process, when public input will be solicited.

**PC #: 174**

**Public Concern: The Forest Plan should include criteria to assess ATV impacts.**

**Response:** Variables that will be measured to assess the impacts of ATV use on the Forests will be defined in the Annual Monitoring Plan of Operations. In the development of that monitoring plan, the spread of non-native invasive species, soil erosion and compaction, stream sedimentation, and the incidence of off-trail riding will all be considered as monitoring elements.

## **Timber Resource Management**

**PC #: 193**

**Public Concern: The Chequamegon-Nicolet National Forests should use compartment management instead of opportunity areas.**

**Response:** The type of Environmental Analysis done in a specific project area is based on the scale and type of activities proposed. It is not uncommon for timber harvest to be in progress on several Ranger Districts at the same time. However, timing or the prioritization of timber sale activity is not a decision made in a forest plan.

**PC #: 442**

**Public Concern: The Final EIS should consider the cumulative effects of changing the forest to an overmature condition.**

**PC #: 132**

**Public Concern: The Chequamegon-Nicolet National Forests should harvest all mature trees.**

**Response:** The 2004 Forest Plan does not provide a management strategy of achieving the estimated Range of Natural Variability (RNV) on the Forests. The Plan does have objectives to maintain species viability, tree species age class diversity, tree species diversity, expansion of large continuous hardwood blocks, restoration of higher levels of natural origin red and white pine, among others. Although some of these objectives move the Forests closer to the estimated RNV, actually reaching RNV was not an objective. A number of species of viability concern are dependent on mature or older trees, snags, down woody debris and closed canopies which are all a result of managing for some older ages classes of timber.

Several species group have their own age class distribution chart (Chapter 2, 2004 Forest Plan). Achieving these distributions will not result in overmature forests.

The uneven-aged hardwood structure tables (Tables 2-4 and 2-5 in Chapter 2 of the 2004 Forest Plan) provide two scenarios for hardwood management. Table 2-4 (22 inch) provides the industry with higher quality hardwood sawtimber at an earlier age than the 1986 Plans. Table 2-5 (25 inch) provides slightly more large-diameter timber at a later age, providing the additional ecological benefits of old large-diameter trees with more coarse woody debris. However, this scenario still provides timber at a quality similar to the 1986 Forest Plans, albeit at slightly lower amounts (estimated at 22% less than Table 2-4).

Should the Forests achieve ASQ, harvest on the Forests would increase compared to current outputs, resulting in a net increase in jobs and revenue to the local communities.

**PC #: 130**

**Public Concern: The Forest Plan should not increase timber harvest levels.**

**PC #: 131**

**Public Concern: The Forest Plan should reduce timber harvesting.**

**Response:** The Allowable Sale Quantity (the quantity of timber that may be sold from the area of suitable land covered by the forest plan for a 10 year period) for the 2004 Forest Plan is lower than it was in the 1986 Plans. In the 2004 Plan, forestwide Goals, Objectives, Standards, Guidelines, Management Area Direction, and Monitoring and Evaluation all provide direction that protects soils, minimizes the spread of Non-Native Invasive Species, and protects the habitat and management of Threatened, Endangered and Regional Forester's Sensitive Species.

The Selected Alternative provides the best opportunity to improve ecological conditions on the Chequamegon-Nicolet National Forests while providing a broad spectrum of recreational opportunities and a realistic level of timber production. It also addresses the issues and concerns specific to the management of the Forests based on internal considerations and public comments.

**PC #: 423**

**Public Concern: The Forest Plan should prohibit all logging.**

**PC #: 170**

**Public Concern: The Forest Plan should prohibit commercial logging in various portions of the loggable forest.**

**Response:** Respondents suggest a variety of limitations on timber harvest ranging from no timber harvest to retention of 300,000 to 800,000 acres of no harvest zones. The Multiple-Use Sustained-Yield Act of 1960 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.” This means that National Forests will be managed to provide for the use of all the various renewable surface resources in the combination that best meets the needs of the American people. The 2004 Forest Plan provides a balance between competing concerns while managing for biological diversity, off-road vehicles, timber harvest, and non- motorized recreation. Examples of this balance include: 1) declines in the amount of aspen tree species as part of ecological restoration while retaining desirable habitat for ruffed grouse or white-tail deer, 2) increasing acreage of non-motorized experiences while providing trails for off-road vehicles, and 3) continuing to produce timber for commercial use while prohibiting timber harvest in some parts of the Forests. A conservative estimate of acreage that would not normally be harvested under the 2004 Forest Plan is approximately 264,000 acres ( MA 5, 5B, 6A, 8E, 8F, 8G).

The Selected Alternative provides the best opportunity to improve ecological conditions on the Chequamegon-Nicolet National Forests while providing a broad spectrum of recreational opportunities and a realistic level of timber production. It also addresses the issues and concerns specific to the management of the Forests based on internal considerations and public comments.

**PC #: 116**

**Public Concern: The Forest Plan should prioritize timber production.**

**Response:** The response to this Public Concern is located in the “Natural Resources Management (General)” section of this Appendix.

**PC #: 140**

**Public Concern: The Forest Plan should increase logging.**

**Response:** The response to this Public Concern is located in the “Alternatives (general)” section of this Appendix.

**PC #: 135**

**Public Concern: The Chequamegon-Nicolet National Forests should meet Forest Plan timber harvest goals.**

**Response:** The Allowable Sale Quantity (ASQ) 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. The ASQ, as defined in the National Forest Management 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 quantity is usually expressed on an annual basis as the ‘average annual allowable sale quantity’.” In the case of the 2004 Forest Plan, the time period specified for ASQ determination is 10 years.



**PC #: 157**

**Public Concern: The Chequamegon-Nicolet National Forests should complete scheduled timber harvests to provide wildlife habitat.**

**Response:** Any pending lawsuits on the Chequamegon-Nicolet National Forests are not considered during the forest plan revision process, and we do not comment on matters of active litigation. However, we are required to manage the Forests for outdoor recreation, range, timber, watershed, and wildlife and fish purposes. The 2004 Forest Plan and FEIS provide for declines in the amount of aspen tree as part of ecological restoration, but will retain desirable habitat for wildlife such as ruffed grouse and white tail deer. Forestwide Goals and Objectives, Standard and Guidelines, and Management Area Direction all provide habitat direction for a variety of game and non-game species.

**PC #: 133**

**Public Concern: The Chequamegon-Nicolet National Forests should halt all timber sales until a final Forest Plan is adopted.**

**Response:** The 2004 Forest Plan does not make decisions on site-specific projects such as Sunken Moose, Northwest Howell, McCaslin, Cayuga, and Hoffman Sailor West.

However, because of the possibility that these projects could potentially affect decisions made in a forest plan by reducing options available, the projects were reviewed during the revision process. None were found to adversely affect the options available for the six primary decisions made in a Forest Plan (Forestwide Multiple-Use Goals and Objectives, Forestwide Standards and Guidelines, Management Area Prescriptions and Standards and Guidelines, Identification of lands suitable for timber production and establishment of an Allowable Sale Quantity, Recommendations to Congress for additional Wilderness, and Forest Plan Monitoring and Evaluation Requirements).

**PC #: 159**

**Public Concern: The Forest Plan should require an EIS and public involvement for proposed timber harvests.**

**Response:** Timber sales and other management activities on the Chequamegon-Nicolet National Forests follow procedures established by the National Environmental Policy Act. Public input and participation is solicited during the site-specific project level analysis.

**PC #: 152**

**Public Concern: The Chequamegon-Nicolet National Forests should recognize the international environmental consequences of closing more areas to timber harvesting.**

**Response:** Current timber output on the Chequamegon-Nicolet National Forests is approximately 100 MMBF (16.2 MMCF) annually, and the combined annual average allowable sale quantity for the Forests in the 2004 Forest Plan is 131 MMBF. This quantity of timber is not significant at global scales. It is also not possible to predict what and where, if any, replacement volume within the world market would occur as a result of harvest levels on the Chequamegon-Nicolet.

**PC #: 53**

**Public Concern: The Forest Plan should provide for old growth timber.**

**Response:** Management Area 8G is characterized by ecosystem complexes and scattered individual stands which feature existing or developing old growth forests and other

exemplary natural communities. In the Selected Alternative, the Forests have allocated 85,500 acres of MA 8G. In addition, Management Areas 8E and 8F (Research Natural Areas and Special Management Areas) generally provide the same type of protection and either provide, or have the potential to provide, old growth features and communities. Approximately 35,000 (MA 8E) and 64,000 (MA 8F) acres are designated in the Selected Alternative.

Several other management areas either prohibit or limit timber management, allowing for the development of old growth conditions on a larger scale. This includes Management Areas 5 (wilderness), 5B (recommended wilderness study areas) and 6A (semi-primitive non-motorized, low disturbance). Approximately 44,000 acres (MA 5), 12,000 acres (MA 5B) and 9,000 acres (MA 6A) are proposed in the Selected Alternative. Finally, Alternative Management Areas (MA 2B, 3B, 4B, and 4C) were designed to allow the development of some old growth characteristics while still providing timber to local communities. Approximately 250,000 acres of MA 2B, 3B, and 4B were proposed in the Selected Alternative.

**PC #: 195**

**Public Concern: The Forest Plan should allow timber harvesting in areas designated as non-suitable for timber.**

**Response:** National Forest Management Act Regulations (36 CFR 219.14) require the identification of lands not suited for timber production for reasons such as: 1) the lands are not forested, 2) the lands are not likely to be restocked with trees as required; and 3) other resource objectives on the lands are not compatible with timber harvest. Planning the sustainable harvest of timber in such areas is contrary to the intent of these regulations. In some of these areas limited harvest is permitted for very specific situations, such as safety/health, disease/pests, etc.

**PC #: 192**

**Public Concern: The Chequamegon-Nicolet National Forests should harvest timber in river and lake zones using State Wild River committee guidelines.**

**Response:** Forested wetlands have been excluded from the suited timber base in all alternatives.

We share the public's concerns for these forest wetland types. Research has not yet provided us with reliable regeneration methods for these species. The National Forest is required to regenerate harvested stands within five years. At this point in time, we cannot assure regeneration success within five years in these forest types. Deer herbivory complicates this lack of knowledge.

Some limited timber management activity is allowable as long as it benefits or maintains the habitat for species of viability concerns (Chapter 2, 2004 Forest Plan). The Forest Plan may be amended in the future if research provides reliable regeneration methods for forested wetlands. Management of these stands would help maintain viability of these forest types and provide habitat for some dependent species.

**PC #: 141**

**Public Concern: The Forest Plan should not restrict the amount of area treated in Management Area 6B within any 10 year period.**

**Response:** The primary intent for Management Area 6B is to provide for a semi-primitive non-motorized experience with low interaction between users. The restrictions on timber management in MA 6B were put in place to ensure that the primary objective

of providing a semi-primitive non-motorized experience is achieved. The limitation on amount of timber to be treated within a 10 year period reduces the interaction between users.

**PC #: 129**

**Public Concern: The Forest Plan should prohibit timber harvests in remote areas that serve as habitat for endangered species.**

**Response:** The 2004 Forest Plan provides direction for habitat protection and maintenance of native wildlife species. Guidelines for this protection and conservation of wildlife habitats are integrated into silvicultural prescriptions, and wetlands and uplands management. In addition, guidelines for specific wildlife habitats and species are provided. Direction for Threatened, Endangered, and Regional Forester's Sensitive Species and their habitat is much more comprehensive than the 1986 Plans.

**PC #: 188**

**Public Concern: The Forest Plan should limit timber harvest adjacent to forest roads to maintain aesthetic appeal.**

**Response:** Forestwide Standards and Guidelines provide direction for harvest activities near roads, trails, recreation use areas, and water bodies based on the Scenic Integrity Objectives (SIO) of the area proposed for timber harvest (see the SIO map in the map packet). These standards and guidelines will be applied at the site-specific level. Public input would be solicited in the decision-making process.

**PC #: 185**

**Public Concern: The Chequamegon-Nicolet National Forests should protect private property values when logging along property lines.**

**Response:** A forest plan does not make decisions about silvicultural treatments adjacent to private property. This is part of site-specific project level analysis and would be guided by the Forestwide Goals, Objectives, Standards, Guidelines, and Management Area Direction of the 2004 Forest Plan. Public participation and input, including that of private landowners near the project area, will be solicited at that time.

**PC #: 191**

**Public Concern: The Final EIS should list all biologically suitable timber acres, total production volume, and constraints.**

**Response:** The response to this Public Concern is located in the "Allowable Sale Quantity" section of this Appendix.

**PC #: 198**

**Public Concern: The Forest Plan should establish separate allowable harvest volumes for the Nicolet and Chequamegon National Forests.**

**Response:** This information is listed in the "Timber and Related Products—Proposed Changes—Allowable Sale Quantity" section of Chapter 3 of the FEIS.

**PC #: 449**

**Public Concern: The Final EIS should explain the low proposed average annual harvest volumes.**

**Response:** The response to this Public Concern can be found in the "Net Public Benefit and Agency Accounting" section of this Appendix.

**PC #: 269**

**Public Concern: The Chequamegon-Nicolet National Forests should selectively use timber harvest to regenerate forested wetlands.**

**PC #: 189**

**Public Concern: The Forest Plan should include forested wetlands in lands suitable for timber harvest.**

**PC #: 184**

**Public Concern: The Forest Plan should not include wetlands in the suitable timber base.**

**Response:** Forested wetlands have been excluded from the suited timber base in all alternatives.

We share the public's concerns for these forest wetland types. Research has not yet provided us with reliable regeneration methods for these species. The National Forest is required to regenerate harvested stands within five years. At this point in time, we cannot assure regeneration success within five years in these forest types. Deer herbivory complicates this lack of knowledge.

Some limited timber management activity is allowable as long as it benefits or maintains the habitat for species of viability concerns (Chapter 2, 2004 Forest Plan). The Forest Plan may be amended in the future if research provides reliable regeneration methods for forested wetlands. Management of these stands would help maintain viability of these forest types and provide habitat for some dependent species.

### **Allowable Sale Quantity**

**PC #: 226**

**Public Concern: The Final EIS should include information regarding potential timber outputs versus the specific ASQ reductions resulting from land management constraints.**

**PC #: 240**

**Public Concern: The Chequamegon-Nicolet National Forests should conduct a thorough benchmark analysis before developing the range of alternatives to comply with 36 CFR 219.12.**

**PC #: 766**

**Public Concern: The Forest Plan should not include the allowable sale quantity constraints outlined in the diversity guidelines.**

**PC #: 191**

**Public Concern: The Final EIS should list all biologically suitable timber acres, total production volume, and constraints.**

**Response:** As part of the Analysis of the Management Situation, benchmark analysis was completed and considered in the development of alternatives. Description and outputs for the benchmarks are listed in Appendix B of the FEIS.

The Maximum Timber Benchmarks (Benchmarks 9-12), with and without meeting the two requirements of maintaining non-declining even flow (NDEF) and harvesting at the culmination of mean annual increment (CMAI), provide the estimations of the maximum potential timber production for the CNNE. These Benchmarks result in estimated average

annual harvest potentials during the first decade of 190-199 MMBF, and long term sustained yield estimates of 309-318 MMBF.

Several other benchmarks potentially produce more in the first decade but have a lower long-term sustained yield than Benchmarks 9-12. For example, the Maximum Present Net Value Benchmark (with assigned hunting values, NDEF, and without CMAI) potentially produces 231 MMBF in the first decade but provides a long term sustained yield of only 266 MMBF.

There was consideration of alternatives with timber production up to these Benchmark levels. Such alternatives were not considered in detail, and the rationale is explained in Chapter 2 of the FEIS.

**PC #: 190**

**Public Concern: The Chequamegon-Nicolet National Forests should revise Objective 2.5 to clarify the Allowable Sale Quantities.**

**PC #: 450**

**Public Concern: The Forest Plan should reference the Allowable Sale Quantity as a 10-year total only.**

**PC #: 134**

**Public Concern: The Forest Plan should include an increased Allowable Sale Quantity.**

**Response:** The respondents are referring to a typographical error which was corrected in the Forest Plan Revision newsletter (April, 2003) and was also posted on the CNNF website. The 2004 Forest Plan Appendix GG shows product/species output for five decades for the Forests.

While the Chequamegon and Nicolet National Forests are administered together, officially they are still considered separate National Forests. As a result, the ASQ for each land base is listed.

**PC #: 169**

**Public Concern: The Forest Plan should include a reduced Allowable Sale Quantity.**

**Response:** The Allowable Sale Quantity is defined in the National Forest Management Regulations (36 CFR 219.3) as, “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 quantity is usually expressed on an annual basis as the ‘average annual allowable sale quantity’.” Therefore, the ASQ is a maximum and not a target.

**PC #: 197**

**Public Concern: The Final EIS should emphasize that the Allowable Sale Quantity in each alternative is lower than the 1986 Forest Plan projections.**

**Response:** An issue identified in the Purpose and Need was that the Forests were unable to provide the levels of timber volume predicted in the 1986 Plans. This shortfall was due to the fact that net growth rates for timber were lower than predicted and acreage available for commercial timber harvest was less than anticipated because of implementation of integrated forest management and meeting goals and objectives for other resources. Tables showing ASQ across all alternatives are available in the “Timber and Related Products—Proposed Changes—Allowable Sale Quantity” section of Chapter 3 of the FEIS.

**PC #: 196**

**Public Concern: The Final EIS should correct the long-term sustained-yield calculation for timber.**

**Response:** Respondents questioned whether growth had been used to calculate long-term sustained-yield. The Long-Term Sustained-Yield was calculated with growth included.

**PC #: 451**

**Public Concern: The Final EIS should identify the projected growth rate for timber and explain how it is calculated.**

**Response:** Forest Vegetation Simulator (FVS), a single-tree growth model that predicts diameter and height growth as well as mortality probabilities for individual trees, was used to predict growth. Lakes States tree data in the TWIGS model was used as its basis. The FVS model aggregates individual tree information to provide stand-level estimates.

Stands having forest type/age class combinations needed for future yield analysis were identified from the Forest databases, and plots were randomly-selected from each grouping. This tree data was analyzed by the FVS model, and yield projections were made for several decades. Therefore, there is not a single growth rate used in the calculation, but a multitude of rates, calculated by the model based on Lakes States forest data, and applied to Forest-inventoried tree data for various tree species and sizes.

Age-based yield tables were then developed for forest types found on the Chequamegon-Nicolet National Forests using projections from the FVS model, yields per acre from harvests on the Forest during the period between 1987 and 1996, and volume estimates based on Forest Inventory and Analysis data.

The yield tables were used to inform the SPECTRUM model that projected outputs, long-term sustained yield, and other numbers related to forest vegetation for the FEIS. Based on projected outputs from the SPECTRUM model, the calculated average annual net growth in cords per acre is 0.43. More detail can be found in the planning record.

## Harvest Methods

**PC #: 455**

**Public Concern: For proposed timber sales, the Chequamegon-Nicolet National Forests should use GPS acre estimates, require separate bids for each tree species, and lower the minimum bid value.**

**Response:** These types of actions are not decided in a Forest Plan. However a short description of existing policy follows:

The number of sales on each district is driven by the Forests' timber sale program budget as received from Congress. Accurate acreage figures for harvest units are critical when the volume in the unit is based on point samples. In essence, the volume on each point (plot) is extrapolated out to the total acreage of the harvest unit. The total acreage for these units is determined by high quality GPS equipment. On rare occasions, the acreage may be taken from an aerial photo when the harvest unit boundary is obvious.

To ensure that changing market conditions are reflected, the advertised rates for Forest Service timber sales are based on timber purchaser bids from the last 4 quarters (1 year). Species are sometimes combined on timber sales, especially for species/product groups (such as hardwood pulp) with similar prices among species. This simplifies bidding and sale administration. When market conditions result in price differences between similar species (such as oak sawtimber being separate from mixed hardwood sawtimber), they



are usually separated. At times, very small volume amounts are combined with a similar species/product if the prices are reasonably close.

**PC #: 430**

**Public Concern: The Forest Plan should apply the same timber harvesting guidelines to each forest.**

**Response:** While outputs such as timber harvest and ATV use differ for the Nicolet and the Chequamegon, forestwide goals, objectives, standards, guidelines, and management area direction are applied consistently across both Forests.

**PC #: 171**

**Public Concern: The Forest Plan should permit local flexibility to implement proper silvicultural techniques.**

**Response:** The 2004 Forest Plan is flexible in its silvicultural guidance. We recognize that a “one-size-fits-all” approach is not always appropriate when applied on the ground. Silvicultural methods will be fine-tuned during site-specific project level analysis.

**PC #: 158**

**Public Concern: The Chequamegon-Nicolet National Forests should not apply silvicultural treatments to 5 percent of even-aged red pine stands.**

**Response:** Respondents are concerned about a Forestwide guideline that calls for encouraging species diversity within 5% of acreage in red pine plantations. Limiting silvicultural treatments such as shelterwood harvest patches, release, scarification, and underplanting to no more than 5% of the total stand will increase within-stand diversity by encouraging future den, mast, or nest trees (Chapter 2, 2004 Forest Plan). While there may be some “loss of investment”, this guideline will benefit a number of wildlife and plant species.

**PC #: 454**

**Public Concern: The Chequamegon-Nicolet National Forests should use Menominee County as a model for sustainable logging practices.**

**Response:** The Forest Service utilizes silvicultural practices as directed by the National Forest Management Act Regulations (36 CFR 219.27). Silvicultural Standards and Guidelines in the 2004 Forest Plan reflect the research efforts of the USDA Forest Service, academics, and other scientists. See Appendix F of the FEIS for more detailed information about silvicultural systems and the references cited.

**PC #: 132**

**Public Concern: The Chequamegon-Nicolet National Forests should harvest all mature trees.**

**Response:** The response to this Public Concern is located in the “Timber Resource Management” section of this Appendix.

**PC #: 55**

**Public Concern: The Chequamegon-Nicolet National Forests should log old growth stands.**

**Response:** Old Growth was identified in the Purpose and Need as an issue to be resolved during forest plan revision. Old growth forests provide a variety of important ecological functions such as high quality habitat for some species of plants and animals, source areas for populations of some species, and soil and water conservation.

Vegetation Guidelines for Old Growth & Natural Feature Complexes (Management Area 8G) provide direction for the removal of timber. Timber salvage operations will be allowed in MA 8G if human life, adjacent lands, Old Growth resources, or structures are threatened, or if the area no longer retains the characteristics for which it was designated. These decisions will be made at the site-specific project level.

**PC #: 143**

**Public Concern: The Forest Plan should prescribe additional clear-cuts.**

**PC #: 142**

**Public Concern: The Forest Plan should prohibit clear-cutting.**

**PC #: 144**

**Public Concern: The Chequamegon-Nicolet National Forests should selectively cut forests.**

**Response:** National Forest Management Act Regulations consider even-aged management (clearcutting) as one of many acceptable silvicultural processes that achieve multiple use objectives in accordance with the Multiple-Use Sustained-Yield Act of 1960. Silvicultural Standards and Guidelines in the 2004 Forest Plan provide language that will effectively direct the proper use of clearcutting on the Forests and minimize impacts to other forest resources. Forestwide Standards and Guidelines also provide for the protection of soils, scenery, aquatic, and other recreational resources when using clearcutting harvest.

**PC #: 145**

**Public Concern: The Forest Plan should prescribe selective, uneven-aged timber harvest in Management Area 2B.**

**PC #: 497**

**Public Concern: The Chequamegon-Nicolet National Forests should modify Alternative 3 to restrict logging in Management Area 2B and protect 400,000 acres of forest.**

**Response:** Management Area 2B was developed to provide relatively continuous mid to late-successional uneven-aged hardwoods through timber management activities designed to mimic natural wind disturbance events. Special standards and guidelines were written to expand and connect northern hardwood blocks and provide more components of mature and old growth forests on the landscape.

The Selected Alternative provides a total of 209,000 acres of MA 2B, compared to 130,000 acres in the Preferred Alternative (Alternative 5) and 450,000 acres in Alternative 3.

**PC #: 456**

**Public Concern: The Chequamegon-Nicolet National Forests should use closed canopy thinning in hardwood stands.**

**Response:** Intermediate even-aged and all uneven-aged hardwood treatments maintain an 80% crown closure as indicated in forestwide guidelines (Chapter 2, 2004 Forest Plan).

**PC #: 138**

**Public Concern: The Forest Plan should only permit timber harvesting on frozen ground.**

**Response:** According to forestwide guidelines for Soils (Chapter 2, 2004 Forest Plan), heavy equipment will be operated during timber harvest only when the soil is not saturated or when the ground is frozen. Guidelines would be applied on a site-specific basis where it is appropriate during project level analysis. In addition timber harvest activities are restricted to frozen ground conditions within MA 2B.

**PC #: 160**

**Public Concern: The Forest Plan should use site characteristics to determine rotation ages.**

**PC #: 199**

**Public Concern: The Forest Plan should require longer growing rotations between timber harvests.**

**Response:** The guidelines related to rotation age were rewritten to incorporate these thoughts. The specific statement is worded as follows in the 2004 Forest Plan: "...Rotation age will be determined by the capability of the site. As a general rule, the standard rotation age will be used except in Management Areas 2B, 3B, 4B and 6B where extended rotation ages will be used."

As indicated in the revised guideline, extended rotations will generally be used in the Alternative Management Areas (MA 2B, 3B and 4B) and in those Semi-Primitive Non-Motorized Areas which allow for timber management (MA 6B). Those areas which generally use standard rotation ages also have reserve tree guidelines which maintain older age classes on all treated sites.

**PC #: 148**

**Public Concern: The Forest Plan should prescribe shorter extended rotation ages for aspen, red oak, and conifer species.**

**PC #: 780**

**Public Concern: The Forest Plan should set the extended rotation of aspen at 60 years.**

**PC #: 68**

**Public Concern: The Forest Plan should establish a 65-year rotation for aspen harvest in Management Areas 2A, 3B, and 4B.**

**Response:** In response to public comments, some standards and guidelines included in the Proposed Plan were revised in the 2004 Forest Plan. The rotation age guideline was rewritten as follows: "...Rotation age will be determined by the capability of the site. As a general rule, the standard rotation age will be used except in Management Areas 2B, 3B, 4B and 6B where extended rotation ages will be used." This provides some flexibility in rotation age depending on site capabilities.

Timber production is not the sole purpose of Alternative Management Areas 2B, 3B, and 4B. In fact, the intention is to decrease the amount of aspen within these areas while increasing the amount of coarse woody debris—something that extended rotation ages will help achieve. The standard rotation ages used in the other management areas (where timber management is practiced) will maintain vigorous growth of timber species.

**PC #: 432**

**Public Concern: The Chequamegon-Nicolet National Forests should require logging contractors to remove and use all downed logs.**

**Response:** Requiring contractors to remove downed materials is not a decision made in the forest plan. This would take place at the site-specific project level following direction provided by the 2004 Forest Plan. Forestwide and management area-specific standards and guidelines address the treatment of residue from timber harvest or other vegetation removal activities.

**PC #: 151**

**Public Concern: The Chequamegon-Nicolet National Forests should require logging contractors to pay for the installation and removal of any necessary roads.**

**Response:** Requiring contractors to pay for road work is not a decision made in a forest plan. Such a requirement, if deemed necessary, would be incorporated into a timber sale contract or permit.

**PC #: 655**

**Public Concern: The Chequamegon-Nicolet National Forests should use logging projects only for the purpose of enhancing bio-diversity.**

**Response:** The 2004 Forest Plan will implement land allocations, standards, guidelines, and management area prescriptions designed to reduce threats for the viability of species at risk, increase success in maintaining species and ecosystem diversity, and maintain and/or restore components of the ecological system important to their sustainability.

**PC #: 694**

**Public Concern: The Forest Plan should manage for extended rotation, high-quality sawlogs.**

**Response:** The emphasis on aspen is expected to decrease forestwide under the 2004 Forest Plan. Currently, 29.8% of the Forests' upland acres are in aspen. Based on management proposed in Alternative 5 (Preferred Alternative in the DEIS) this figure would reduce to 29.4% in 10 years and 20.0% in 100 years. The Selected Alternative goes further by reducing these figures to 29.2% and 19.2% at 10 and 100 years. Conversely, the emphasis on northern hardwoods is expected to increase under the 2004 Forest Plan. The management proposed for Alternative 5 increases hardwood from its current 39.7% of upland to 40.0% in 10 years and 50.2% in 100 years. Under the Selected Alternative, the northern hardwood component increases to 40.0% in 10 years and 50.7% in 100 years.

In some areas, aspen is being maintained at levels higher than thought to exist in pre-European settlement times. Some of the reasons for maintaining aspen include: 1) Wisconsin is one of the leading paper/pulp regions in the world and some manufacturers depend on aspen for their products; 2) aspen is valuable habitat for ruffed grouse, woodcock and other early successional wildlife species and many Forest users seek out aspen habitat for hunting and wildlife viewing; and 3) aspen provides habitat for Threatened or Sensitive prey species such as the timber wolf and goshawk.

Rotation ages for aspen in the 2004 Forest Plan range from 45 to 70 years of age.

## Fire Management

**PC #: 458**

**Public Concern: The Chequamegon-Nicolet National Forests should use fire as a management tool.**

**PC #: 203**

**Public Concern: The Forest Plan should strengthen the current standards and guidelines for fire suppression and prescribed fire.**

**Response:** Management Area direction provides Standards and Guidelines related to the use of fire as a management tool when it is appropriate. For example, Management Area 8C (Riley Lake Wildlife Area and Moquah Barrens Area) provides guidelines for prescribed burning. Other burning projects take place elsewhere on the Forests where certain management conditions are desired. More detailed fire management plans will be prepared at the site-specific project level.

**PC #: 204**

**Public Concern: The Chequamegon-Nicolet National Forests should not use commercial logging to reduce fire risk.**

**PC #: 784**

**Public Concern: The Forest Plan should restrict the placing of structures in fire-prone areas.**

**Response:** Forestwide and management area-specific standards and guidelines have been developed that relate to fire management. See Chapters 2 and 3 of the 2004 Forest Plan for more information. Although little change is expected in the risk of wildfire or fuels reduction in the Wildland/Urban Interface, forestwide guidelines provide direction that will focus fuels reduction activities in the urban interface and areas surrounding communities at risk. More specific fire management will be analyzed, if necessary, at the project planning level. Public input would be solicited at that time.

## Forest Health Management

**PC #: 785**

**Public Concern: The Forest Plan should not allow salvage logging in areas that restrict timber harvest.**

**Response:** Decisions to engage in salvage operations would be done at the site-specific project level following requirements established by the National Environmental Policy Act (NEPA). Some Management Area Prescriptions discourage salvage harvest to retain the characteristics of natural forest communities. However, fire management guidelines also recognize the need for fuels reduction within the urban interface and areas surrounding communities at risk.

**PC #: 115**

**Public Concern: The Chequamegon-Nicolet National Forests should monitor and revise the Forest Plan as needed to ensure forest health.**

**PC #: 139**

**Public Concern: The Chequamegon-Nicolet National Forests should monitor forest health in previously logged areas.**

**Response:** Minimum monitoring and evaluation requirements have been established through the National Forest Management Act regulations (36 CFR 219). They require that the Forests document the effects of silvicultural prescriptions, including significant changes in the productivity of the land. They also require monitoring of population trends for management indicator species due to habitat changes.

The aim of monitoring is adaptive management – the ability to respond to current conditions or make appropriate changes based on new information or technology. The 2004 Forest Plan may be amended or revised in the future to adapt to new information or changed conditions.

**PC #: 206**

**Public Concern: The Chequamegon-Nicolet National Forests should use forest management responsive to natural disturbances.**

**Response:** The models did not incorporate natural disturbance when predicting forest trends. It is impossible to pinpoint areas of natural disturbance on the ground. Incidents involving disturbances such as ice, fire, or wind would be analyzed at the site-specific project level following requirements established by the National Environmental Policy Act (NEPA).

**PC #: 162**

**Public Concern: The Chequamegon-Nicolet National Forests should propose aggressive timber harvesting to ensure forest health.**

**Response:** The Chequamegon-Nicolet National Forests will continue to manage the Forests to improve ecological conditions while supplying a realistic and sustainable level of timber harvest.

The Allowable Sale Quantity (ASQ) 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 Regional and Forest priorities.

**PC #: 147**

**Public Concern: The Forest Plan should establish an emergency procedure for salvage harvest.**

**Response:** In response to public comment, some Standards and Guidelines have been revised on the 2004 Forest Plan. The third guideline under Forest Health has been removed because it was already covered in guidelines related to Rotation Lengths. This guideline allows the forest to waive minimum rotation ages for stands that have been significantly affected by fire, windthrow, insect or disease attack or other similar natural disturbance forces. The establishment of an emergency procedure for salvage harvest, if necessary, would be developed during site-specific project level analysis.

**PC #: 50**

**Public Concern: The Chequamegon-Nicolet National Forests should evaluate on a project-by-project basis the amount of potential salvage to leave unharvested after large disturbance events.**

**Response:** In response to public comment, there have been some modifications to guidelines between the draft and final versions of the Forest Plan that address this



concern. Amount of potential timber salvage left unharvested has been expanded from 10% in the proposed Forest Plan to 5-15% in the 2004 Forest Plan. Likewise, unharvested salvage for the Alternative Management Areas has been expanded from 25% to 15-25%. These changes take into account a case-by-case need for coarse woody debris, potential for future impacts, and the value of the resource.

**PC #: 452**

**Public Concern: The Forest Plan should clarify if blowdowns will be salvaged forestwide.**

**Response:** Fuel reduction will be accomplished through a variety of mechanical means including timber salvage sales, roller chopping, mowing, and others. The word “mechanical” is intended to mean that fuel reduction in the wildland/urban interface will be done with means other than prescribed fire.

**PC #: 48**

**Public Concern: The Chequamegon-Nicolet National Forests should actively manage for forest health.**

**Response:** Forestwide Standards and Guidelines in the 2004 Forest Plan provide guidance that relates to Forest Health. See Chapter 2 of the Forest Plan for more information. Insect or disease infestations will be evaluated at the site-specific project level.

**PC #: 457**

**Public Concern: To decrease the risk of tick born diseases, the Chequamegon-Nicolet National Forests should preserve the number of trees.**

**Response:** The risk of tick-borne diseases to humans, for any reason, is not something that is decided or analyzed in a forest plan. These are public health issues that would be studied outside this branch of the Agency.

## Other Forest Products

**PC #: 200**

**Public Concern: The Chequamegon-Nicolet National Forests should assess availability of special forest products, determine sustainable harvest and regeneration methods, and establish annual monitoring efforts.**

**PC #: 201**

**Public Concern: The Chequamegon-Nicolet National Forests should provide educational brochures that illustrate sustainable harvest methods for special forest products.**

**Response:** The Notice of Intent to prepare an Environmental Impact Statement (June 1996) recognized that direction on the gathering of special forest products was lacking in the 1986 Plans. As a result, the 2004 Forest Plan includes goals and objectives that ensure 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. Permittees who gather forest products are usually given informational materials on how, where, and when to harvest them.

## Domestic Livestock Management

**PC #: 202**

**Public Concern: The Forest Plan should prohibit all livestock grazing.**

**Response:** Because there are few areas on the Chequamegon-Nicolet National Forests suitable for livestock grazing, only a few permits have been issued for livestock such as bison. We do not anticipate any increase in livestock grazing activity on the Forests.

## Mineral Resources

**PC #: 146**

**Public Concern: The Chequamegon-Nicolet National Forests should maintain all existing roads.**

**Response:** The respondent(s) have concerns that roads may be closed and will limit development of alternative energy sources or mining resources. Decisions to close roads would be done at the site-specific project level following guidance in the 2004 Forest Plan. Forestwide Standards and Guidelines (Chapter 2) and Management Area Prescriptions (Chapter 3) in the 2004 Forest Plan provide direction on road closures and decommissioning. In addition, see response to PC # 207 and PC # 211 below.

**PC #: 460**

**Public Concern: The Forest Plan should not allow mining in the national forest.**

**Response:** The National Forest Management Act (36 CFR 219.22) states that “Mineral exploration and development shall be considered in the management of renewable resources.” Management Area Standards and Guidelines offer direction and guidance on mineral exploration and development. See Chapter 3 of the 2004 Forest Plan for more information.

**PC #: 207**

**Public Concern: The Forest Plan should clarify obligations to allow exploration and development of federally owned mineral rights.**

**Response:** In the case of congressionally designated wilderness, the Congress of the United States can withdraw or modify access to federally owned minerals in the legislation that establishes the wilderness area. Access to the Federal mineral estate in recommended wilderness study areas has not been withdrawn by Congress and therefore is open to mineral prospecting activity. Mitigation measures can be used to mitigate or prevent negative effects on proposed wilderness study areas.

The Bureau of Land Management (BLM) has the authority to manage the Federal mineral estate on National Forest lands. BLM issues permits for mineral prospecting and the Forest Service attaches specific permit operating requirements and mitigations to minimize or eliminate impacts to surface resources. However, the Forest Service cannot attach mitigations and operating requirements that will prevent the permit holder from reasonably prospecting the mineral estate. Forest Service policy is to “foster and encourage” the orderly and economical development of domestic mineral resources. Only the Secretary of Agriculture can make a request to the Secretary of the Interior to withdraw an area of the National Forest from mineral prospecting or extraction. This process requires the National Forest to make a case as to why mitigation cannot make mineral prospecting compatible with wilderness study area values or demonstrate how mineral prospecting activity would make the wilderness study area unsuitable.

**PC #: 218**

**Public Concern: The Forest Plan should include descriptions of federally owned, reserved, and outstanding mineral rights, and the legal requirements for each.**

**Response:** Forestwide and Management Area Standards and Guidelines have been revised to ensure compliance with existing laws and policies concerning minerals management.

**PC #: 219**

**Public Concern: The Forest Plan should incorporate current minerals and mining data.**

**Response:** The National Forest Management Act (36 CFR 219.22) states that, “Mineral exploration and development shall be considered in the management of renewable resources.” Management Area Standards and Guidelines offer direction and guidance on mineral exploration and development. See Chapter 3 of the 2004 Forest Plan for more information.

**PC #: 210**

**Public Concern: The Forest Plan should prohibit activities inconsistent with wilderness in Management Area 5B.**

**Response:** The guideline that allows the continued utilization of existing gravel sources was developed to allow the use of one existing gravel pit that occurs just inside the boundary of a proposed Management Area 5B. This existing gravel pit was determined to be needed to help meet the National Forest policy of maintaining at least a 10 year supply of mineral materials to meet in-service demand.

The reason access was maintained to this one existing gravel source is because there are no other known sources within that area that could serve as an alternative source. The potential area of disturbance for the gravel pit area is less than 10 acres and is located on the perimeter of the MA 5B area adjacent to a high traffic road. Operation and reclamation of this existing gravel source would not make the MA 5B area unsuitable for future Wilderness designation.

**PC #: 209**

**Public Concern: The Forest Plan should not restrict surface-disturbing mineral activities to the "season when recreation use is lowest."**

**Response:** Agree. Standards and Guidelines for MA 5B, and Standards and Guidelines for MA 6A, have been adjusted as suggested in the 2004 Forest Plan. The following wording is retained: “New road construction will be accomplished using the minimum standards necessary. Minimize the cutting of brush and trees for surface exploration”

The goal of this Guideline in MA 5B and MA 6A is to minimize as much as practicable the interaction between non-compatible Forest uses. Limiting surface disturbance is also a part of these Guidelines and is a major mitigation objective in all current mineral prospecting activities.

**PC #: 211**

**Public Concern: The Forest Plan should limit mineral development in Management Area 5B.**

**PC #: 212**

**Public Concern: The Forest Plan should limit mineral development in Management Area 6A.**

**Response:** Minerals management is part of the Multiple Use mandate of the National Forest System, meaning that minerals are to be managed on an equal if not priority basis with other resources. Forest planning regulations require the planning process to consider the effects of renewable resource prescriptions and management direction on mineral resources and activities, including exploration and development. (Burkhart and Holm, 2003).

The history of mineral prospecting activity on the Chequamegon-Nicolet National Forests has shown that access roads are predominantly temporary, low standard, and use existing travel corridors when possible. Also, the amount of surface and vegetative disturbance has been found to be very minor. Limiting surface disturbance has been a major mitigation objective in all current mineral prospecting activity.

In the case of congressionally designated Wilderness, the Congress of the United States can withdraw or modify access to the Federally-own minerals in the legislation that establishes the individual Wilderness. However, access to the Federal mineral estate in recommended Wilderness Study Areas has not been withdrawn by Congress and therefore, is open to mineral prospecting activity. Mitigation measures can be used to mitigate or prevent negative effects on proposed Wilderness Study Areas.

Providing common variety materials (gravel) is one of the multiple uses of a National Forest. Forest Service mineral materials (i.e. gravel) policy is to make mineral materials available to the public and to local, State, and Federal government agencies. National Forest policy also requires that a Forest maintain a minimum 10 year supply of mineral material. In order to maintain an adequate supply it is necessary to keep areas open for future exploration and development of mineral materials. For the Chequamegon-Nicolet National Forests, common variety minerals are a critical resource for maintenance of the developed road system. In addition, the National Forest has need for common variety minerals for internal uses such as recreational facilities and trails, and use by Forest permit holders and contractors.

The Bureau of Land Management (BLM) has the authority to manage the Federal mineral estate on National Forest lands. BLM issues permits for mineral prospecting and the Forest Service attaches specific permit operating requirements and mitigations to minimize or eliminate impacts to surface resources. However, the Forest Service cannot attach mitigations and operating requirements that will prevent the permit holder from reasonably prospecting the mineral estate. Forest Service policy is to “foster and encourage” the orderly and economical development of domestic mineral resources. Only the Secretary of Agriculture can make a request to the Secretary of the Interior to withdraw an area of the National Forest from mineral prospecting or extraction. This process requires the National Forest to explain why mitigation cannot make mineral prospecting compatible with semi-primitive non-motorized area values or demonstrate how mineral prospecting activity would make the area unsuitable.

The history of mineral prospecting activity on the Chequamegon-Nicolet National Forests has shown that access roads are predominantly temporary, low standard, and use existing travel corridors when possible. Also, the amount of surface and vegetative disturbance has been found to be very minor. Limiting surface disturbance has been a major mitigation objective in all current mineral prospecting activity.

Reserved and Outstanding mineral rights represent private ownership of the mineral estate. These rights are subject to public law and deed language concerning the definition of those rights and can not be superceded by forest plan standards and guidelines. Reserved rights are subject to the Secretary of Agriculture's rules and regulations for mineral exploration. Outstanding rights are subject to deed language and State laws.

Purchase of reserved and outstanding mineral rights would require an appraisal of the potential mineral estate. This would probably require some kind of exploration of the mineral resource to determine value. The State of Wisconsin does have a law that provides for surface owners to acquire outstanding mineral rights when those rights have become dormant. The CNNF has done this in the past for priority areas. However, when dormant mineral rights become part of the Federal mineral estate, they are still open to mineral prospecting under the administration of the BLM.

**PC #: 213**

**Public Concern: The Forest Plan should limit mineral development in Management Area 6B.**

**Response:** The intent for Management Area 6B was to keep these areas open for minerals management because this activity is not in conflict with the Moderate Disturbance theme of the management area. By policy, the Forest Service is required to reclaim common variety mineral sources that have been exhausted and are closed.

**PC #: 205**

**Public Concern: The Forest Plan should include mineral development guidelines for Management Areas 8A, 8B, and 8C.**

**Response:** The intent for Management Areas 8A, 8B, 8C was to keep these areas open for minerals management because this activity in general is not in conflict with the management themes of these areas.

**PC #: 214**

**Public Concern: The Forest Plan should include additional mineral standards and guidelines for Management Area 8D.**

**Response:** There are six existing sources of common variety minerals (gravel pits) adjacent to or within Management Area 8D river corridors. These existing sources were determined to be needed to help meet the National Forest policy of maintaining at least a 10 year supply of mineral materials to meet in-service demand. Development of new common variety minerals sources would be prohibited if it would change a river's eligibility for Wild, Scenic, or Recreational River status. By policy, the Forest Service is required to reclaim common variety mineral sources that have been exhausted and are closed.

**PC #: 215**

**Public Concern: The Forest Plan should limit mineral development in Management Area 8E.**

**PC #: 216**

**Public Concern: The Forest Plan should limit mineral development in Management Area 8F.**

**PC #: 217**

**Public Concern: The Forest Plan should limit mineral development in Management Area 8G.**

**Response:** There are four existing sources of common variety minerals (gravel pits) adjacent or within Research Natural Areas (MA 8E), eight adjacent to or within Special Management Areas (MA 8F), and sixteen adjacent to or within Old Growth & Natural Feature Complexes (MA 8G). Collectively, MA 8E, 8F, and 8G are known as Ecological Reference Areas. These existing sources are needed to help the Forests meet the National Forest policy of maintaining at least a 10 year supply of mineral materials to meet in-service demand. Development of new common variety minerals sources would be prohibited.

Only the Secretary of Agriculture can make a request to the Secretary of the Interior to withdraw an area of the National Forest from mineral prospecting or extraction. This process requires the National Forest to explain why mitigation cannot make mineral prospecting compatible with ecological reference area values or demonstrate how mineral prospecting activity would make the ecological reference area unsuitable.

### Utility Facilities

**PC #: 220**

**Public Concern: The Forest Plan should reference the 1999 Telecommunications Act section regarding the North Country and Ice Age Trails.**

**Response:** Duplication of requirements contained within laws, regulations, policies, or agreements are not included in the Standards and Guidelines in the 2004 Forest Plan.

The Standards and Guidelines were developed to govern Federal actions, and are not to control or constrain any Cell Tower Citing Company's actions on non-Federal land.

The North Country Trail Association and the Ice Age Park and Trail Foundation would be notified of any Federal actions, in compliance with current laws, regulations, policies, or agreements and conducted as a part of a site specific citing proposal.

Concerns raised from the Cell Tower Citing Company, Trail Organizations, and others would be considered by the deciding Federal official during the site specific analysis.

### Social Values

**PC #: 453**

**Public Concern: The Final EIS should adequately analyze job loss impacts to the social environment.**

**Response:** At the CNNFs' current levels of production and management, there will be an increase in jobs and income in the Northern Wisconsin Economic Impact Area (NWEIA) and in the Wisconsin Pulp and Paper Economic Impact Area (WPPEIA) compared to existing levels. No reduction of current work forces due to CNNF management decisions is expected (See FEIS Social/Economics Analysis section for more details). There is a loss of 'potential' for more jobs in the 2004 Forest Plan when compared to Alternative 1, which is based on the projections of the 1986 Plans.



**PC #: 183**

**Public Concern: The Final EIS should consider social and economic impacts to all citizens.**

**Response:** All comments and concerns are reviewed by the Forest Service and addressed as part of the NEPA process. The Chequamegon-Nicolet National Forests are a national resource and decisions regarding the management of this forest are made in conjunction with national as well as local concerns. Working closely with local governments, interest groups, and user groups is an important part of the decision-making process. This will continue, and develop further, as the 2004 Forest Plan is implemented.

The selected alternative in the FEIS represents what Forest managers believe to be the best balance of outputs and services in achieving sustainable ecosystems and meeting the intent of laws, as well as in addressing the issues and concerns specific to the management of the Chequamegon-Nicolet National Forests that were identified in the Purpose and Need and as part of public concerns. See the FEIS for more detailed information

**PC #: 102**

**Public Concern: The Forest Plan should prioritize intrinsic values.**

**PC #: 101**

**Public Concern: The Forest Plan should prioritize the needs of future generations.**

**Response:** The Chequamegon-Nicolet National Forests will continue to provide opportunities to those who wish to escape the noise and distractions of everyday life and retreat to the peace and solitude that can be found on the Forests. In addition to the current 44,000 acres of congressionally designated Wilderness, the Forests have identified three areas Recommended Wilderness Study Areas (MA 5B) in the 2004 Forest Plan. These recommended additions would provide a 36 percent increase in the Wilderness acreage on the Forests. Once Wilderness is designated officially, it remains in that status in perpetuity.

In addition, the Chequamegon-Nicolet National Forests will provide increases in the acreage of non-motorized areas, giving recreationists more opportunities to experience the solitude the forest has to offer.

## Economic Values

**PC #: 707**

**Public Concern: The Forest Plan should adopt an alternative that better protects timber-related jobs and income.**

**Response:** The DEIS was revised and edited to better clarify information and to make it more understandable. Part of this revision was the attempt to clarify the difference between Alternative 1, known as the ‘no action’ alternative, and the actual on-the-ground conditions on the Forests (the “Current Condition”). Alternative 1 is based on management direction in the 1986 Chequamegon and Nicolet Forest Plans, not the actual management and outputs constrained by budget for the Forests. When compared to the Current Condition, employment in the Northern Wisconsin Economic Impact Area (NWEIA) increases from 5.4%-32.6% across alternatives. Nonetheless, there will be a loss of the potential *opportunity* to have 3,000 more jobs. This does not, however, imply an actual reduction of the current work force.

**PC #: 786**

**Public Concern: The Final EIS should improve and better support its economic impact analysis.**

**Response:** Between the draft and final EIS there has been substantial revision that will address a majority of the comments associated with this Concern.

The 5,802 manufacturing jobs belong to the Wisconsin Pulp and Paper Economic Impact Area (WPPEIA), not the Northern Wisconsin Economic Impact Area (NWEIA). The amount of manufacturing jobs for the current condition in the NWEIA is 7,777. The tables in the DEIS have been revised and clarified in the FEIS.

The term ‘manufacturing’ can encompass activities such as pulp, paper and mill work, as well as other textile creation. For clarification of the use of the word ‘manufacturing’ in the economic analysis, please see the glossary of the FEIS (Appendix G).

Three IMPLAN economic models were used to calculate the amount of employment and income the CNNF contributes to three separate Economic Impact Areas through its resource outputs and forest operations (salaries, road constructions, etc.), including both market and otherwise priced outputs. These are complex models, which have been used successfully by economists for many years. Several economists and scientists were consulted throughout the process. Some of those consulted specifically for economic analysis assistance were Susan Winter, (Economist, Inventory and Monitoring Institute), Rick Holkans (Economist, Region 9 Office USDA Forest Service), Mike Retzlaf (Economist, Region 2 Office USDA Forest Service), and Mike Niccolucci (Economist, Inventory and Monitoring Institute). For more details about the analysis process see Chapter 3 and Appendix B of the FEIS.

### **Contribution/Role of Agency Lands and Resources to Economy**

**PC #: 711**

**Public Concern: The Final EIS should clarify unemployment rates.**

**PC #: 710**

**Public Concern: The Final EIS should not exaggerate the significance of timber harvesting to the local economy.**

**PC #: 239**

**Public Concern: The Final EIS should include an economic analysis of the timber sale program.**

**Response:** The DEIS was revised and clarified to better explain how data was used. Among other topics, unemployment and timber revenues and their relation to the CNNF and the areas that are impacted by the Forest management activities were addressed. Please see Chapter 3 of the FEIS and Appendix B for more details.

**PC #: 702**

**Public Concern: To stabilize local communities, the Forest Plan should focus on high-quality sawlogs rather than aspen production.**

**Response:** Under the 2004 Forest Plan, the Forests are focusing more on high quality sawtimber than aspen production. Under the 1986 Forest Plans (Alternative 1), there were 400,000 acres of Management Area 1 (aspen emphasis). Acres in Management Area 1 were reduced to 226,000 acres in Alternative 5 (draft plan Preferred Alternative) and 231,000 acres in the Selected Alternative. There were 422,000 acres in the 1986 Forest

Plans' Management Area 2 (northern hardwoods emphasis). Acres allocated to Management Area 2 increased to 649,000 acres in the Preferred Alternative and 646,000 acres in the Selected Alternative.

**PC #: 121**

**Public Concern: To aid local businesses, the Forest Plan should expand ATV use.**

**Response:** The Selected Alternative allows for the development of up to 85 miles of trails on the Nicolet side of the Forests. In addition, the existing network of town-designated ATV routes will be enhanced through the designation of classified Forest roads as ATV routes. Designation of ATV routes will be considered in consultation with township governments and the public. Opening of ATV routes will be part of site-specific project level analysis and public input will be solicited.

**PC #: 708**

**Public Concern: The Chequamegon-Nicolet National Forests should offer alternatives to access tourism businesses if snowmobile and ATV trails are discontinued.**

**Response:** Neither snowmobile nor ATV use will be discontinued on the Forests. However, under the 2004 Forest Plan, ATV use will be limited to designated trails or routes (roads designated open for ATV use). Miles of designated ATV trails will increase on both the Chequamegon and the Nicolet. Motorized trail relocations and new trail development will be accomplished in coordination with local communities.

**PC #: 704**

**Public Concern: The Final EIS should consider impacts to county funding.**

**Response:** When compared to the current situation, the payments to counties from the 25% Fund increase in all alternatives. While the Allowable Sale Quantity (ASQ) is the upper limit of volume of timber that can be produced, other factors also affect timber outputs. Among other items, the annual Forest budget can limit the actual timber output sold. For example, the projected ASQ (1<sup>st</sup> Decade) in the Selected Alternative exceeds the actual outputs of the past ten years. When compared to the projections made by the 1986 Forest Plan (i.e. Alternative 1), there is a loss in opportunity for increasing the ASQ in the Selected Alternative. However, the Selected Alternative provides an opportunity for increasing real timber outputs, which would increase timber revenues and payments to counties through the 25% Fund.

## Net Public Benefit and Agency Accounting

**PC #: 104**

**Public Concern: The Final EIS should consider the long-term economic value of protected forests.**

**Response:** The FEIS considers the long-term values associated with both using and protecting forests. The values considered are both economic (market or assigned values) and non-priced (social and ecological). Economic efficiency, which considers forest program costs, market-based values (revenues received directly), assigned values (activities such as hiking, fishing, wilderness use), and non-consumptive wildlife uses (e.g. bird watching), was analyzed in the EIS.

Design and evaluation of alternatives also involved values that are not readily expressed in economic terms. Appendix B in the FEIS documents the 100-year economic analysis

of market and non-market activities. The results of this analysis are only part of the values considered in the identification of the Selected Alternative. Chapter 3 of the FEIS documents broader value considerations, including ecological values such as species viability, and social values such as experiential opportunities available on the Forests.

**PC #: 85**

**Public Concern: The Final EIS should not equate the economic output of non-motorized recreation with that of motorized recreation.**

**PC #: 701**

**Public Concern: The Final EIS should not equate the economic output of motorized recreation with that of non-motorized.**

**Response:** Motorized and non-motorized recreations are both important activities that occur on the CNNF. Between the draft and the final EIS the discussion of motorized and non-motorized issues has been revised and clarified. For more information please see the “Social/Economic Analysis” and “Access and Recreation Opportunities” sections Chapter 3 of the FEIS. Appendix B in the FEIS describes the development of the Social/Economic Analysis process.

**PC #: 709**

**Public Concern: The Final EIS should include the economic trends of the affected counties and of the forest products market.**

**Response:** The economic and social analysis section of the EIS underwent substantial revision between the draft and final versions. Part of this was the inclusion of the Shannon-Weaver Index for economic health for the 15 counties in the Northern Wisconsin Economic Impact Area. This index gives an overall picture of the economic health of each county in comparison to the rest of the counties in the United States (for further details see Chapter 3 of the FEIS).

In addition, the FEIS contains the revised recreation opportunity assessments. CNNF-contributed recreation opportunities can be indicators of tourism. ‘Tourism’ itself includes revenues from restaurants, hotels, merchandise, and so on that surround the actual recreation activities (i.e. ATV, skiing, hiking, hunting, etc). Since the CNNF has no restaurants or hotels from which to generate revenue, these external monies were not examined in this EIS and therefore a total ‘tourism’ analysis was not conducted. Only those recreation activities actually contributed by CNNF lands were considered as part of revenues included in the economic analysis.

**PC #: 449**

**Public Concern: The Final EIS should explain the low proposed average annual harvest volumes.**

**PC #: 236**

**Public Concern: The Final EIS should address economic losses stemming from failure to apply proper and timely silvicultural treatments.**

**Response:** Long Term Sustained Yield (LTSY) is defined as: “The highest uniform wood yield from lands being managed for timber production that may be sustained under a specified management intensity consistent with multiple use objectives.” By definition, LTSY is consistent with multiple use objectives and is sustained under a specified management intensity.

Although each alternative considered in the EIS meets a set of multiple use objectives, management intensity varies considerably. Some of the multiple use objectives include species diversity, age class diversity and achieving landscape objectives. Through time the decadal Allowable Sale Quantity is predicted to increase assuming the specified management intensity remains as described in the 2004 Plan and long term multiple use management objectives are met. LTSY would be reached when sustainable full growth potential has been realized under this specified management intensity. The Allowable Sale Quantity is less than LTSY until LTSY is reached, at which time the two values would be equal – this is related to the requirement for non-declining even-flow of timber production.

The Maximum Timber Benchmarks (Benchmarks 9-12), with and without meeting the two requirements of maintaining non-declining even flow (NDEF) and harvesting at the culmination of mean annual increment (CMAI), provide the estimations of the maximum potential timber production for the CNMF. These Benchmarks result in estimated average annual harvest potentials during the first decade of 190-199 MMBF, and long term sustained yield estimates of 309-318 MMBF.

Several other benchmarks potentially produce more in the first decade but have a lower long-term sustained yield than Benchmarks 9-12. For example, the Maximum Present Net Value Benchmark (with assigned hunting values, NDEF, and without CMAI) potentially produces 231 MMBF in the first decade but provides a long term sustained yield of only 266 MMBF.

The suited forestland determination is found in Appendix M and the constraints used in SPECTRUM are found in Appendix B of the FEIS. These two components have the most impact on how the model projects Allowable Sale Quantity and Long Term Sustained Yield.

**PC #: 239**

**Public Concern: The Final EIS should include an economic analysis of the timber sale program.**

**Response:** The Response to this Public Concern is located in the “Contribution/Role of Agency Lands and Resources to Economy” section of this Appendix.

**PC #: 787**

**Public Concern: The Forest Plan should require monitoring of the economic effects of the timber sale program.**

**Response:** The total volume of timber offered and sold, the species-product mix offered and sold, and the related values are continually monitored in the timber management program. Acres treated are monitored by harvest method and by forest type. Monitoring will also include comparison of the accomplished timber program to the potential levels provided by the 2004 Forest Plan.

**PC #: 105**

**Public Concern: The Chequamegon-Nicolet National Forests should not subsidize logging.**

**Response:** Any policy regarding the subsidization of industries is not within the scope of the forest plan revision.

The level of timber production proposed is based on an analysis of the management direction that leads to the highest net public benefit, including consideration of costs, and priced and non-priced values associated with the management of the Forests.

**PC #: 706**

**Public Concern: The Final EIS should not equate price and value when calculating net present value.**

**Response:** The value for non-market goods are set by RPA and adjusted by the Regional Economist for inflation. The Forests are required to incorporate the non-market values into our calculations.

## List of Respondents to the Draft Forest Plan and DEIS by Affiliation

The table below displays the self-identified government agencies, elected officials, and interest group and business representatives who submitted comments on the draft forest plan and draft environmental impact statement (DEIS) during the formal comment period. The table is organized by affiliation type. Each respondent's name is listed alphabetically within each group. The unique identifying number that was assigned to each response letter for tracking purposes is also listed here. Many respondents submitted multiple different letters, in which case all letter numbers are listed. Any exact duplicate letters from the same respondent(s) that we received by different delivery methods (both fax and e-mail, for example) only appear under one letter number.

**Table 3. List of respondents to the draft forest plan and DEIS by organizational affiliation**

ORGANIZATION	CITY	STATE	Letter #
<b>Academic Organizations</b>			
WISCONSIN DEPARTMENT OF NATURAL RESOURCES /SVC	LUCK	WI	1321
UNIV OF WISCONSIN MADISON SYNCHROTRON RADIATION CENTER	STOUGHTON	WI	1183
HABITAT EDUCATION CENTER	MADISON	WI	1853
HABITAT EDUCATION CENTER	MADISON	WI	1969
UNIV OF WISCONSIN STEVENS POINT	STEVENS POINT	WI	1860
UNIV OF WISCONSIN MADISON/DEPT. OF FOREST ECOLOGY AND MANAGEMENT	MADISON	WI	1567
UNIV OF WISCONSIN MADISON/DEPT. OF BOTANY	MADISON	WI	559
UNIV OF WISCONSIN MADISON/DEPT. OF FOREST ECOLOGY AND MANAGEMENT	MADISON	WI	1163
MONONA GROVE SCHOOL DISTRICT	MONONA	WI	1866
<b>Businesses</b>			
WEATHER SUPPER CLUB/EVERBREEZE RESORT	MOUNTAIN	WI	240
CHRIS ANNE BEST	UNKNOWN	WI	1214
AL & LINDA'S POUR HAUS	SURING	WI	232



ORGANIZATION	CITY	STATE	Letter #
WOLF RUNNER INN, INC.	SURING	WI	230
WOJCIESZAK FLAMBEAU RESORT	PARK FALLS	WI	71
WI INNKEEPERS ASSN.	BROOKFIELD	WI	1595
WISCONSIN RESTAURANT ASSN.	MADISON	WI	1307
FLYNN'S LAKEWOOD AMOCO & CARWASH	LAKEWOOD	WI	239
MOUNTAIN TOP	MOUNTAIN	WI	238
NORTHERN REALTY & LAND CO.	MOUNTAIN	WI	237
SHADY ACRES TAVERN INC.	MOUNTAIN	WI	236
LAKEWOOD HOTEL & BAR	LAKEWOOD	WI	235
DONN ATANASOFF, ATTORNEY	IRON RIVER	MI	45
TA MOTORSPORTS INC.	FRANCIS CREEK	WI	234
RHODE'S OASIS SHELL	SURING	WI	233
SPUR OF THE MOMENT RANCH,	MOUNTAIN	WI	249
KATHY NAVACKES, RESORT OWNER	GLIDDEN	WI	2004
LAKEWOODS RESORT	CABLE	WI	1294
JUNCTION SALES & SERVICE, INC.	SURING	WI	241
<b>County Government</b>			
ASHLAND COUNTY FORESTRY DEPT.	GLIDDEN	WI	1650
TAYLOR COUNTY FORESTRY & RECREATION	MEDFORD	WI	1132
TAYLOR COUNTY ZONING DEPT.	MEDFORD	WI	137
WI COUNTIES ASSN.	MADISON	WI	1348
BAYFIELD COUNTY TOWN OF	DRUMMOND	WI	1543
WI COUNTY FORESTERS ASSN.	TOMAHAWK	WI	1442
WI COUNTIES ASSN.	MADISON	WI	1974
FLORENCE COUNTY FOREST ADMINISTRATOR	FLORENCE	WI	1961
OCONTO COUNTY BOARD OF SUPERVISORS	OCONTO	WI	229
BAYFIELD COUNTY TOURISM &	WASHBURN	WI	1154
TAYLOR COUNTY BOARD OF SUPERVISORS	MEDFORD	WI	568
BARRON COUNTY	BARRON	WI	20
<b>Placed-Based Groups</b>			
PRIVATE LANDOWNERS OF WISCONSIN	CAZENOVIA	WI	1657
ICE AGE PARK AND TRAIL FOUNDATION	MADISON	WI	1914

ORGANIZATION	CITY	STATE	Letter #
NEW FLYNN LAKE WILDERNESS	UNKNOWN	WI	2014
LAKE STATES RESOURCE ALLIANCE INC.	RHINELANDER	WI	2017
THREE LAKES HISTORICAL SOCIETY, INC.	THREE LAKES	WI	1064
FRIENDS OF STARKWEATHER CREEK BASIN	MADISON	WI	1954
<b>Federal Agencies</b>			
US DEPARTMENT OF THE INTERIOR, OFFICE OF THE SECRETARY	PHILADELPHIA	PA	939
USDA FOREST SERVICE NORTHEASTERN AREA RESEARCH STATION	SAINT PAUL	MN	916
<b>Civic Groups</b>			
WILLY STREET PARK SOCIETY	MADISON	WI	1842
SIERRA STUDENT COALITION/MHS ECO CLUB	AUGUSTA	WI	1886
NAMAKAGON LAKE ASSN.	CABLE	WI	1369
LEAGUE OF WOMAN	HIGH BRIDGE	WI	1663
ASHLAND-BAYFIELD COUNTY LEAGUE	HIGH BRIDGE	WI	1353
SIERRA STUDENT COALITION/MHS ECO CLUB	EAU CLAIRE	WI	1885
<b>Permittees</b>			
NORTH COUNTRY GUIDE SERVICE	CONOVER	WI	1376
<b>Timber or Wood Products</b>			
BIEWER LUMBER CO.	ISHPEMING	MI	1460
BIEWER LUMBER	PRENTICE	WI	1488
AMERICAN FOERST RESOURCE COUNCIL	PORTLAND	OR	1547
BIEWER LUMBER	PRENTICE	WI	1486
FRYBERGER, BUCHANAN, SMITH	DULUTH	MN	1354
WI PROFESSIONAL LOGGERS ASSN.	FLORENCE	WI	1833
PINE RIVER LUMBER CO. LTD.	LONG LAKE	WI	1596
NICOLET HARDWOODS CORP.	LAONA	WI	1303
MIDWEST FOREST PRODUCTS CO.	HAYWARD	WI	1463
STETSON HARDWOODS	STETSONVILLE	WI	1362
TIMBER PRODUCERS ASSN. OF MI & WI	RHINELANDER	WI	1285
LA PAC CORP	TOMAHAWK	WI	1587
NICOLET HARDWOODS CORP.	LAONA	WI	134

ORGANIZATION	CITY	STATE	Letter #
LA PAC CORP	TOMAHAWK	WI	1966
WI PAPER COUNCIL	NEENAH	WI	1286
COUNTY LINE WOOD PRODUCTS	CONOVER	WI	136
<b>Preservation/Conservation Organizations</b>			
SIERRA CLUB/CHIPPEWA VALLEY	MENOMONIE	WI	1927
NATURE CONSERVANCY	MADISON	WI	1070
SIERRA CLUB/EAU CLAIRE CHAPTER	EAU CLAIRE	WI	1890
WI ARBORIST ASSN.	MILWAUKEE	WI	1874
AMERICAN LANDS ALLIANCE	MINNEAPOLIS	MN	1337
TOWN AND COUNTRY GARDEN CLUB/SHEBOYGAN COUNTY	SHEBOYGAN FALLS	WI	454
TX PARKS & WILDLIFE	AUSTIN	TX	1153
FAEGRE & BENSON LLP	MINNEAPOLIS	MN	1522
FAEGRE & BENSON LLP	MINNEAPOLIS	MN	1999
HEARTWOOD FOREST WATCH	BROOKPORT	IL	6
SIERRA CLUB/EAU CLAIRE CHAPTER	EAU CLAIRE	WI	1896
AMERICAN LANDS ALLIANCE	MINNEAPOLIS	MN	1926
LAKE SUPERIOR ALLIANCE	ASHLAND	WI	1287
WILDLIFE MANAGEMENT INSTITUTE	PRATT	KS	549
RUFFED GROUSE SOCIETY	LAONA	WI	2015
HABITAT EDUCATION CENTER	MADISON	WI	1522
GREAT OLD BROADS FOR WILDERNESS	DURANGO	CO	1500
WI SHARPTAIL GROUSE SOCIETY	GRANTSBURG	WI	1998
WI SHARPTAIL GROUSE SOCIETY	MADISON	WI	1993
SIERRA CLUB/GRT WATERS GROUP	MILWAUKEE	WI	1151
ENVIRONMENTALLY CONCERNED CITIZENS OF THE LAKELAND AREA	MINOCQUA	WI	852
AMERICAN LANDS ALLIANCE	MINNEAPOLIS	MN	1598
AUDUBON SOCIETY/CHEQUAMEGON	WASHBURN	WI	1329
SIERRA CLUB / JOHN MUIR CHAPTER	MADISON	WI	1522
4 LAKES GREEN PARTY	MADISON	WI	1504
WI AUDUBON COUNCIL	WISCONSIN RAPIDS	WI	1441
LINWOOD SPRINGS RESEARCH STATION	STEVENS POINT	WI	1227

ORGANIZATION	CITY	STATE	Letter #
DEFENDERS OF WILDLIFE	WASHINGTON	DC	1522
GREENPEACE	WASHINGTON	DC	1976
ENVIRONMENTAL LAW & POLICY CENTER OF	CHICAGO	IL	1522
CONSERVE BIOLOGIST OF UPPR	SAXON	WI	325
RIVER ALLIANCE OF WI	MADISON	WI	1982
RIVER ALLIANCE OF WI	MADISON	WI	1971
<b>Professional Society</b>			
WI SOCIETY FOR ORNITHOLOGY,	MILWAUKEE	WI	755
<b>Tribal Entities</b>			
LAKE SUPERIOR OJIBWAY/LAC COURTE OREILLES AND ST. CROIX BAND	ODANAH	WI	1970
<b>Mechanized Recreation</b>			
BIKE NORTHWOODS TOUR	MADISON	WI	760
BIKE FEDERATION OF WI	MADISON	WI	933
<b>Recreation/Conservation</b>			
NATIONAL WILD TURKEY FEDERATION	DE PERE	WI	1837
RUFFED GROUSE SOCIETY	LAONA	WI	253
WI SHARP-TAILED GROUSE SOCIETY	GRANTSBURG	WI	1237
RUFFED GROUSE SOCIETY, IOWA CHAPTER	UNKNOWN	IA	1957
PRICE COUNTY COMMUNITY TRAILS	PARK FALLS	WI	1996
RUFFED GROUSE SOCIETY	EAU CLAIRE	WI	1179
NATIONAL WILD TURKEY FEDERATION	DE PERE	WI	1536
RUFFED GROUSE SOCIETY	BUCKHANNON	WV	1002
RUFFED GROUSE SOCIETY	BUCKHANNON	WV	341
<b>Motorized Recreation</b>			
LEGENDARY CIVILIAN JEEPERS	WEST BEND	WI	286
ASSOCIATION OF WI SNOWMOBILE CLUBS	APPLETON	WI	1915
NORTHERN WI FOUR-WHEEL DRIVE CLUB	UNKNOWN	WI	2023
ASSOCIATION OF WI SNOWMOBILE CLUBS	APPLETON	WI	1959
WI FOUR-WHEEL DRIVE ASSN.	DE FOREST	WI	1289
ELK COUNTRY ATV CLUB	GLIDDEN	WI	218

ORGANIZATION	CITY	STATE	Letter #
WI FOUR-WHEEL DRIVE ASSN.	DE FOREST	WI	1906
SOUTHERN PRICE COUNTY ATV CLUB	PRENTICE	WI	1277
ELK COUNTRY ATV CLUB	SUPERIOR	WI	226
BADGERLAND TNT 4X4 CLB	EAGLE	WI	1203
ENVIRONMENTAL COMMITTEE, ASSN. WI SNOWMOBILE CLUBS	UNKNOWN	WI	2002
ASSN. WI SNOWMOBILE CLUBS	UNKNOWN	WI	1936
ELK COUNTRY ATV CLUB	HAYWARD	WI	265
WI SNOWMOBILE CLUBS	RIDGEWAY	WI	672
TP SNOWCLUB INC.	PICKEREL	WI	268
ASSN. WI SNOWMOBILE CLUBS, LANGLADE CHAPTER	UNKNOWN	WI	2026
WI ATV ASSN. INC.	SHEBOYGAN	WI	1583
NORTHWOODS RANGE ROVERS ATV CLUB	PHILLIPS	WI	78
NORTHWOODS RANGE ROVERS ATV CLUB	PHILLIPS	WI	70
SOUTHERN PRICE COUNTY FOUR-WHEELERS	CATAWBA	WI	1278
PRICE COUNTY ATV TRAILS ASSN.	PHILLIPS	WI	86
FLORENCE COUNTY ATV CLUB	FLORENCE	WI	126
CLEARWATER FOUR-WHEELERS	BLOOMER	WI	1901
WI ATV ASSN.	RHINELANDER	WI	2019
IRON RIV ATV CLB ENTHUSIASTS	IRON RIVER	WI	1462
BELLEVILLE SNO-CATS SNOWMOBILE CLUB	BELLEVILLE	WI	201
ELK COUNTRY ATV CLUB	CHIPPEWA FALLS	WI	69
BAYFIELD COUNTY SNOWMOBILE	OLON SPRINGS	WI	1375
MIDWEST FOUR-WHEEL DRIVE ASSN.	DE FOREST	WI	1908
WI SNOWMOBILE CLUBS	UNKNOWN	WI	371
ASSN. OF WI SNOWMOBILE CLUBS INC.	APPLETON	WI	1161
ELK COUNTRY ATV CLUB	GLIDDEN	WI	321
ASSN. WI NATIONAL SNOWMOBILE CLUBS	EAU CLAIRE	WI	1918
WI FOUR-WHEEL DRIVE ASSN.	WAUKESHA	WI	1943
<b>Non-Motorized Recreation</b>			
ICE AGE PARK & TRAIL FOUNDATION	MILWAUKEE	WI	138
MN FOR RESP RCRTN	DULUTH	MN	1836
ICE AGE PARK & TRAIL FOUNDATION INC.	MADISON	WI	1525

ORGANIZATION	CITY	STATE	Letter #
ICE AGE PARK & TRAIL FOUNDATION INC.	RIDGELAND	WI	1015
<b>State Agencies and Officials</b>			
WI CONFERENCE/FLORENCE COUNTY	UNKNOWN	WI	2028
ST WI/BD OF COMMISSIONERS OF PUBLIC LANDS	MADISON	WI	940
ST WI/BD OF COMMISSIONERS OF PUBLIC LANDS	LAKE TOMAHAWK	WI	941
ST WI/BD OF COMMISSIONERS OF PUBLIC LANDS	LAKE TOMAHAWK	WI	1160
ST OF WI/DEPT OF NATURAL RESOURCES	MADISON	WI	1284
WI STATE LEGISLATURE/HOUSE OF REP.	MADISON	WI	1909
WI STATE LEGISLATURE/HOUSE OF REP.	MADISON	WI	361
<b>Town Government</b>			
GRAND VIEW TOWN BOARD	GRAND VIEW	WI	1664
TOWN OF LAONA	LAONA	WI	116
<b>Other Organizations</b>			
NAMAKAGON TRAIL GROOMERS	CABLE	WI	326
MIND SPIRIT INSTITUTE	WAUKESHA	WI	1139
WILDLIFE MANAGEMENT INSTITUTE	PRATT	KS	324
ARENZ MOLTER MACY & RIFFLE	WAUKESHA	WI	2
HEARTWOOD COUNCIL/LEGISLATIVE CMMTE	MADISON	WI	1288
<b>Multiple Use Organizations</b>			
LAKE STATES RESOURCE ALLIANCE INC.	RHINELANDER	WI	547