



United States
Department of
Agriculture

Forest
Service



Environmental Assessment

"Changes EA"

Appends to the EA and the Specialist Report EA
(for changes made after 6/24/2010)

Kitchi Resource Management

Blackduck Ranger District
Chippewa National Forest
Beltrami, Cass, and Itasca Counties, Minnesota

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Table 1.3.a -- Proposed Action (Alternative C)

Treatment/Activity (Alt. C)	Amount
The Windigo Portage on Star Island has inadequate toilet facilities (3315).	Construct a new toilet near the portage (in 2-44-8). This is not a water treatment plant. The material will be collected in a sealed vault and hauled off the island.

Table 1.3.b - Alternative C (modified) Harvest Acres by Forest Type and General Prescription

Forest Type	Coppice (4102)	Clearcut - Patch (4115)	Clearcut (4117)	Shelter wood (4131)	Single Tree Sel. (4151)	Group Selection (4152)	Shelter (UAM) (4193)	Thinning (4220)	Salvage (4232)	Total Acres
Jack Pine (1)	0	0	0	0	0	0	0	43	0	43
Red Pine (2)	0	0	14	0	0	65	3	891	0	973
White Pine (3)	0	0	0	0	0	0	0	7	0	7
Fir/Spruce (11)	24	0	0	0	0	0	0	0	0	24
White spruce (16)	0	0	0	0	0	0	0	58	0	58
Black Ash (71)	3	0	0	0	0	0	0	0	0	3
Sugar maple (82) & Mix N. Hdwd (89)	0	0	0	0	23	132	101	0	0	256
Aspen (91, 95)	157	50	14	0	66	119	195	53	0	654
Paper Birch (92)	0	0	0	26	0	57	45	29	27	184
Totals	184	50	28	26	89	373	344	1081	27	2202

Table 1.3.c - Alternative C (modified) Conversions by Forest Type, Harvest Type, and Future Type *

Forest Type	Coppice 4102	Clearcut 4117	Shelter wood 4131	Single tree selection 4151	Group Selection 4152	Shelter UAM 4193	Thinning 4220	Component Only	Natural conversion	Total Converted Acres	Total Component Acres
Red Pine (2)	0	4 JP	0	0	0	0	0	10 comp JP in 4152		4	10
Fir/Spruce (11)	24 095 type	0	0	0	0	0	0	0		24	0
Ash (71)	3 A	0	0	0	0	0	0	0		3	0
Sugar Maple (82)	0	0	0	0	0	0	0	10 comp WP		0	10
Mix N. Hdwd (89)	0	0	0	0	0	0	0	17 comp WP in 4152		0	17
Aspen (91)	0	0 JP 3 RPWP	0	66 MNH	26 oak 94 MNH	35 oak 95 MNH	43 MNH	1 comp WP in 4102 15 comp WP in 4152 3 comp WP in 4193 5 comp RPJP in 4152		378	24
Aspen/Spruce (95)	0	11 WS	0	0	0	33 MNH	5 RP 5 MNH	2 comp WP		54	2
Paper Birch (92)	0	0 JPRP	0	0	57 MNH	45 MNH	6 RP 0 MNH	0 comp WP in 4131 9 comp WP in 4152	14 MNH	138	9

Forest Type	Coppice 4102	Clearcut 4117	Shelter wood 4131	Single tree selection 4151	Group Selection 4152	Shelter UAM 4193	Thinning 4220	Component Only	Natural conversi on	Total Converted Acres	Total Compone nt Acres
								0 comp WP in 4193			
WL Openings	0	0	0	0	0	0	0	7 JP 2 JPRP 1 RP 5 RPJPWS 1 Tama 9 Tama + 6 WP 5 WP + 4 WSTama 3 ash 27 MNH 19 A 2 fruiting shrub		91	0
Total Convert	53	9	0	66	177	217	59	148	14	692	72

*Abbreviations in the table are A - aspen, WS - white spruce, PB - paper birch, MNH - mixed northern hardwoods, JP - jack pine, RP - red pine, Tama - tamarack, and WP - white pine.

Numbers are the affected acreages.

"comp" means a component of the species is underplanted in the stand.

Table 1.3.d - Alternatives B, C, and D -- All Treatments* by Forest Type

Treatment	acres in Alt. B	acres in Alt. C	acres in Alt. D	Alt. C (modified)
Treatments by Forest Types				
Aspen (91)	1,009	877	493	635
Aspen/spruce (95)	169	115	70	115
Red Pine (2)	1,043	1,272	1,146	1,272
Maple (82)	195	161	92	161
Paper Birch (92)	248	213	51	183
Northern Hardwoods (89)	182	182	61	182
Jack Pine (1)	220	139	0	52
White Spruce (16)	58	58	58	58
Black Ash (71)	56	29	18	18
White Pine (3)	7	37	37	37
Balsam Fir (11)	27	24	0	24
Openings (97. 98. 99)	231	238	238	238
Total	3,445	3,345	2,264	2,966

* "All Treatments" includes all proposed management activities (harvesting, other vegetation treatments, roads, boat landings, gravel pit, etc.)

1.5 - SCOPING AND PUBLIC INVOLVEMENT

The environmental assessment for this project was made available for a 30-day public review and comment period from June 27 to July 27, 2010. On June 24 a Public Comment Letter and the EA (or a notification that the EA was available) were sent to 138 individuals, groups, and agencies who either commented during the initial scoping period or requested a copy. It was also posted on the Chippewa NF website. The legal notice for this action was published in the Blackduck The American on June 27, 2010. Two responses were received. A summary of these comments (Comments 51 and 52) and the Forest Service responses to them are in Appendix C (Appended) to the "Changes EA". During the same period there were 2 other contacts with requests for information or with questions (Comments 49 and 50). Thus these 4 persons retained their appeal rights.

Contacts with the Leech Lake Tribal Historic Preservation Office (THPO) and State Historic Preservation Office (SHPO) have been made and consultation under Section 106 has been completed. On June 25, 2010 a letter was sent to the archaeologist in the Supervisor's Office requesting Section 106 Consultation with Leech Lake Band of Ojibwe. The Section 106 Consultation letter was sent to the THPO and to the SHPO on July 6, 2010 (PR# 514 and 514a). We received a letter back from SHPO on July 29 with "we conclude that no properties listed in or eligible for listing in the National Register of Historic Places will be affected by this project" (PR# 540). A response letter from THPO was received August 23 stating, "I am in concurrence with your recommendations." (PR# 555).

On August 30, the deciding officer signed the decision notice/FONSI for the Star Island Vault Toilet installation project. Since the decision was not appealable a letter announcing the signing was sent to 64 persons, groups, and agencies that needed to know. A legal notice was published in The American on September 5, 2010.

On August 31, the deciding officer signed the decision notice/FONSI for the Kitchi Resource Management EA (short the Star Island Toilet). A letter detailing their appeal rights was sent to 4 people. A letter announcing the signing was sent to 65 persons, groups, and agencies that needed to know. A legal notice was published in The American on September 5, 2010.

2.5 - COMPARISON OF ALTERNATIVES

Alternative C (modified) is the preferred alternative in the Decision Notice/FONSI for the KRM EA, based on recent consultation, new biological surveys, and information from replies to the public comment letter. It is added to several tables from the KRM EA to show the differences between it and the other alternatives, to help the Deciding Officer make his choice. All of the changes came from information in tables in the DN/FONSI that show stand-by-stand changes.

TABLE 2.5.a Approximate Acres/Miles/Sites Impacted on National Forest System Land by KRM EA

	Alt. A	Alt. B	Alt. C	Alt. D	Alt. C (modified)
Volume Harvest (est. in CCF)	0	36,021	26,556	14,679	22,003
Acres of Clearcutting/Coppice Cutting	0	1,193	488	225	261
Acres of Shelterwood Cutting	0	68	49	25	26
Acres of Single Tree Selection Cutting	0	124	89	89	89
Acres of Group Selection Cutting	0	309	373	114	373
Acres of Two-Aged Shelterwood (UAM) Cutting	0	324	381	193	344
Acres of Thinning	0	913	1,172	898	1,080
Acres of Sanitation Cutting	0	27	27	0	27
Acres of Planting harvested stands	0	474	69	41	28
Acres of Planting Components of conifers in stands	0	18	28	24	21
Acres of riparian planting	0	51	51	15	51
Acres of release	0	590	185	117	137
Acres of animal damage control	0	273	157	96	109

	Alt. A	Alt. B	Alt. C	Alt. D	Alt. C (modified)
Acres of fuels reduction - removal	0	605	306	133	210
Acres of fuels reduction - pile burning	0	95	28	18	28
Acres of fuels reduction - underburning	0	43	169	169	169
Acres of ecosystem burning	0	0	278	278	287
Miles of Temporary Road	0	0.65	0.65	0.45	0.65
Acres of Mechanical Scarification Site Preparation	0	572	145	96	81
Acres of planting wildlife openings with WP, WS, tama, fruiting shrubs, etc.	0	35	35	37	35
Acres of maintaining wildlife openings	0	142	142	140	142
Acres of letting wildlife openings regenerate naturally to mixed northern hardwoods	0	48	48	48	48
New Andrusia Boat Landing Parking Lot	0	yes	yes	no	yes
New Star Island Toilet	0	yes	yes	yes	yes
Rehabilitate Gravel Pit	0	yes	yes	yes	yes
Upgrade Pimushe Lake Canoe Landing Road	0	yes	yes	yes	yes
Treat Bass Lake access road	0	close	fix/upgrade	close	close
Enlarge Winnie Boat Landing Parking Lot	0	yes	yes	yes	yes
Enlarge Big Lake Boat Landing Parking Lot	0	yes	yes	yes	yes
	0				
	0				
CHANGES FROM CURRENT CONDITIONS:	0				
Change in acres of jack pine	0	+102	+37	+13	+13
Change in acres of red pine	0	-49	+16	+16	+16
Change in acres of white pine	0	+28	+28	+34	+11
Change in acres of aspen	0	-305	-380	-227	-376
Change in acres of aspen/spruce	0	-2	-29	-35	-54
Change in acres of fir/spruce	0	-27	-24	0	-24
Change in acres of paper birch	0	-154	-138	-25	-122
Change in acres of white spruce	0	+15	+15	+17	+15
Change in acres of mixed northern hardwoods	0	+435	+492	+260	+461
Change in acres of black ash	0	-26	0	0	0
Change in acres of oak	0	+61	+61	+27	+61
Change in acres of tamarack	0	+10	+10	+10	+10
Change in acres of fruiting shrubs	0	+2	+2	+2	+2
Change in acres of upland openings/wildlife openings	0	-90	-90	-92	-90
Component of white pine planted	0	61	64	26	57
Component of red pine planted	0	5	5	0	5
Component of jack pine planted	0	0	10	10	10

Table 2.5.b Summary of Impacts of Alternatives on Selected Indicators for the Issues (not included above)

	Alt. A	Alt. B	Alt. C	Alt. D	Alt. C (modified)
Key Issue 1. Harvest Volume:					
Percentage and acreage of harvest treatments that are clearcuts/coppice cuts compared to the Forest Plan goal of 39%.	0%, 0 acres	40%, 1,193 acres	19%, 488 acres	15%, 225 acres	12%, 261 acres (since most stands deferred were clearcuts)

	Alt. A	Alt. B	Alt. C	Alt. D	Alt. C (modified)
Percentage and acreage of 0-9 year age-class made by treatments.	0%, 0 acres	4.4%, 1,344 acres	2.0%, 620 acres	1.1%, 335 acres	1.3%, 393 acres
Acres of over mature aspen treated (used >50 years for minimum age for over mature aspen)	0	929 out of 3,367 mature acres	929	492	687
Percentages of species compositions compared to Forest Plan LE objectives.	Variable - See summary in Section 3.1.4.7 in this EA and tables in Section 3.1.4.7 of the Specialist Report EA (PR# 480)	Variable - See summary in Section 3.1.4.7 in this EA and tables in Section 3.1.4.7 of the Specialist Report EA (PR# 480)	Variable - See summary in Section 3.1.4.7 in this EA and tables in Section 3.1.4.7 of the Specialist Report EA (PR# 480)	Variable - See summary in Section 3.1.4.7 in this EA and tables in Section 3.1.4.7 of the Specialist Report EA (PR# 480)	Variable - All of the tables were not redone for Alt. C (modified) - results are very close to Alt. C
Key Issue 2. Traditional Resources and Uses:					
Acreage and number of stands in which historic, traditional use is potentially precluded by harvesting.	0 acres, 0 stands	1,329 acres, 73 stands	537 acres, 41 stands	250 acres 19 stands	310 acres, 29 stands
Acreage and number of stands in which historic, traditional use is potentially undesirably changed by harvesting.	0 acres, 0 stands	1,698 acres, 90 stands	2,044 acres, 104 stands	1,296 acres, 77 stand	1,869 acres, 92 stands
Effects of treatments or lack of treatments on traditionally gathered resources.	Variable +-, See Section 3.3.3.3.2	Variable +-, Essentially same as Alt. C			
Number of stands deferred, modified, or retained that are mentioned by the LLBO as traditional gathering sites.	31 deferred	2 deferred, 1 modified, 28 retained	5 deferred, 8 modified, 18 retained	24 deferred, 4 modified, 3 retained	11 deferred, 14 modified, 6 retained
Acres of clearcutting changed to other treatments that maintain structure, age, and species composition or that maintain "ecological function" (Comments 37.4 and 40.5).	All deferred	past 49 defer/modify, 337 extra acres red pine clearcutting	past 49 defer/modify, From B modify the 337 red pine, 321 defer, 459 modify	past 49 defer/modify, From C 264 defer	past 49 defer/modify, From B modify the 337 red pine, 321 defer, 459 modify, From C 161 defer, 30 modify
Acres of harvest treatments changed to less intensive methods between alternatives.	No harvest	Baseline	459 acres	459 acres (same as Alt. B)	512 acres
Acres of harvest treatments deferred between alternatives.	No harvest	Baseline	376 acres	1,035 acres	731 acres
Acres of mature red pine harvest and type of harvest (Comment 19.3).	0	351 clearcut, 48 other cut	14 clearcut, 369 other cut	4 clearcut, 287 other cut	14 clearcut, 369 other cut
Acres of harvesting in sugar	0	291	256	68	256

	Alt. A	Alt. B	Alt. C	Alt. D	Alt. C (modified)
maple stands (Comment 19.6).					
Acres of row thinning that decrease diversity (Comment 19.2).	0	771	632	516	632
Acres of mature jack pine clearcut.	0	81	0	0	0
Acres treated for increased blueberry production (Comments 5.1, 14.4, and 25.1).	0	342	600	461	617
Treatments within ¼ mile of tribal lands.	0	37 stands, 398 acres	37 stands, 398 acres but less intensive cutting	25 stands, 113 acres	29 stands, 274 acres but less intensive cutting (plus 9 acres burning)
Non-key: Harvesting, roads, and other vegetation management activities, especially in riparian zones or near wetlands, may cause water quality/visual problems:					
Acres, number of stands, and types of harvesting within 200 feet of riparian areas or wetlands.	0	77 acres	73	19	74
Acres of RMZ (area within 200 ft. of lakes and streams) disturbed during vegetation management activities.	0	290	259	93	258
Effects from this harvesting.	None	Minimal but highest	Minimal	Minimal but least	Minimal
BMP's required to be used to protect water resource in those zones	None	Lower BAs. Down woody debris. Time of year for harvest. Reserve Trees. Filter strips. Stream crossing protection. Water bars (diversions).	Lower BAs. Down woody debris. Time of year for harvest. Reserve Trees. Filter strips. Stream crossing protection. Water bars (diversions)	Lower BAs. Down woody debris. Time of year for harvest. Reserve Trees. Filter strips. Stream crossing protection. Water bars (diversions).	Lower BAs. Down woody debris. Time of year for harvest. Reserve Trees. Filter strips. Stream crossing protection. Water bars (diversions)
Acres treated for long-lived species in Riparian zones	0	294	290	45	290
Species planted in riparian zones	0	Plant white pine and red pine (with some mixed jack pine) along with natural	Plant white pine and red pine (with some mixed jack pine) along with natural	Plant white pine and red pine (with some mixed jack pine) along with natural	Plant white pine and red pine (with some mixed jack pine) along with natural northern hardwoods

	Alt. A	Alt. B	Alt. C	Alt. D	Alt. C (modified)
		northern hardwoods	northern hardwoods	northern hardwoods	
Percentage of upland in sub-watersheds in young and open condition.	Varies by watershed from 1 to 28%	Varies by watershed from 2 to 28%	Varies by watershed from 1 to 28%	Varies by watershed from 1 to 28%	Varies by watershed from 1 to 28%
Non-key: Management near wetlands or filling wetlands has negative effects on the wetlands:					
Effects of treatments to wetlands other than RMZs.	None	With BMPs there should be no negative effects.	With BMPs there should be no negative effects.	With BMPs there should be no negative effects.	With BMPs there should be no negative effects.
Non-key: Harvesting near the Mississippi River may negatively affect wild rice:					
Acres of harvesting along the Mississippi River, within 200 feet.	0	33	33	0	33
Effects on wild rice from this harvesting.	None	None	None	None	None
Non-key: Management activities can spread non-native invasive plants:					
Acres/types of soil exposure.	No activities, no change.	Disturb 2,959 acres harvesting, 3 parking lots, 7 temp roads, Star Island Toilet. Enter 18 stands through NNIS ditches.	Disturb 2,581 acres harvesting, 3 parking lots, 7 temp roads, Star Island Toilet. Enter 16 stands through NNIS ditches.	Disturb 1,546 acres harvesting, 2 parking lots, 5 temp roads, Star Island Toilet. Enter 7 stands through NNIS ditches.	Disturb 2,200 acres harvesting, 3 parking lots, 7 temp roads, Star Island Toilet. Enter 16 stands through NNIS ditches.
Non-key: Harvest activities may negatively impact habitat for red shoulder hawk, goshawk and other sensitive species:					
Effects to TES and their habitats.					
Red Shouldered hawk - conversions to northern hardwoods	none	middle	most conversions	least conversions	Same as Alt. C
Red Shouldered hawk - uneven-aged mgmt in northern hardwoods is beneficial	none	middle	most	least	Same as Alt. C
Goshawk - acres clearcut in foraging territory - %	0 - 52 to 62%	233 - 51 to 60%	129 - 51 to 61%	64 - 51 to 62%	129 - 51 to 61%

	Alt. A	Alt. B	Alt. C	Alt. D	Alt. C (modified)
suitable left					
General TES	No change	negative due to jack pine clearcutting	positive due to ecosystem burning	positive due to ecosystem burning	positive due to ecosystem burning
Non-key: Excessive clearcutting leads to a lack of diversity:					
Conversions help diversity	None	766 acres	713 acres	407 acres	660 acres
Planting components helps diversity	None	66 acres	79 acres	36 acres	55 acres
Planting making more diverse in clearcuts	None	478 acres	74 acres	46 acres	33 acres
Amount of clearcutting	None	Most	middle	Least	Same as Alt. C
Non-key: Management under the Proposed Action in riparian zones does not meet Forest Plan guidance for long-lived species in riparian areas:					
Activities leaving long-rotation species	0	294	290	45	290
Activities leaving short-rotation species	0	241	141	42	138
Non-key: Management in riparian zones is just being done to get more volume:					
See Section 1.6 for discussion of meeting Forest Plan guidance	---	---	---	---	---
Non-key: Forest Service land management has effects other than the one prescribed in "prescriptions" or "environmental assessments". The Forest Service prescribes certain activities with certain effects, but does not do the activity properly, does not do what they say, or does not follow through:					
See Section 1.6 for discussion of monitoring.	---	---	---	---	---
Non-key: Reducing upland aspen cover type acres would have a negative effect on wildlife species that depend on this forest type, particularly Ruffed Grouse:					
Acres of aspen converted to other forest types.	0	396	396	292	341

	Alt. A	Alt. B	Alt. C	Alt. D	Alt. C (modified)
Acres of aspen regenerated to aspen.	0	635	392	187	206
Impacts on ruffed grouse	Slowly reduced habitat	Lot of new habitat but big clearcuts by hunter walking trails	Best - lot of new habitat and patch cutting by HWT	Least new habitat but patch cutting by HWT	Same as Alt. D - some new habitat and patch cutting by HWT
Impact on hunting grouse	Less habitat as stands age out of 0-9 years.	New 0-9 aspen stands, most clearcutting, least patch cutting.	New 0-9 aspen stands, less clearcutting but most patch cutting.	Least new 0-9 aspen stands, medium patch cutting.	New 0-9 aspen stands, less clearcutting but most patch cutting.
Impact on hunting deer	20% forage, 23% thermal	18% forage, 22% thermal	17% forage, 24% thermal	16% forage, 24% thermal	16% forage, 24% thermal
Impact on hunting woodcock	Decreased young habitat	Minor new 0-9 in riparian	Minor new 0-9 in riparian	Minor new 0-9 in riparian	Minor new 0-9 in riparian
Non-key: Location of toilet on Star Island may affect cultural and heritage resources. Lack of improved restroom facilities perpetuates ongoing sanitation problems which may increase with increased use:					
Effects from new toilet	No change, sanitation problems continue	Reduced sanitation problems, no visual problem	Same as Alt. B	Same as Alt. B	Same as Alt. B

CHAPTER 3 - ENVIRONMENTAL CONSEQUENCES

3.0 - Added Blueberry Stands

There were three stands from the Sand Plain EA and the Cass Lake EA that were prescribed for burning to promote blueberry production. These stands were inadvertently not included in the analysis in the Kitchi EA, so will be analyzed here in order to be included in the Decision Notice. This type of treatment is highly desired by the LLBO DRM and LICs. District 1 Compartment 137 Stand 54 is a stand of jack/red pine regeneration with some large red pine in the overstory. It has abundant blueberry plants, but they are becoming overtopped by trees, shrubs, grass, and forbs. In Cass Lake EA periodic prescribed burning was prescribed to enhance blueberry production in this stand. In Sand Plain EA similar stands (partly harvested, partly naturally open) had a similar prescription. Conditions of the three stands and surrounding area and traditional uses of the area have not changed since the previous analyses. Kitchi EA calls for similar types of traditional uses. Therefore no changed conditions were seen and it is recommended that these three stands retain their previous prescriptions and be carried forward into the Kitchi EA's DN, so they are not accidentally left out of future funding and projects.

3.13.4 – EFFECTS

3.13.4.1 – DIRECT AND INDIRECT EFFECTS

3.13.4.1.1 – ALTERNATIVE A (NO ACTION)

3.13.4.1.2 – ALTERNATIVE B

3.13.4.1.3 – ALTERNATIVE C

3.13.4.1.4 – ALTERNATIVE D

Most surveys for heritage resources and biological resources were completed in 2009 prior to the project analysis. The final surveys for stands that were added later in the NEPA process for KRM EA returned results in August of 2010. There are numerous heritage sites within stands that are proposed for treatment. All of these will be protected as described in Section 3.13.4.1.3 of the EA and here in the "Changes EA". In most cases this involves buffering the sites and doing no treatment in the sites or buffers, but not deferring the stands. In four wildlife openings the treatments can occur because there will be no ground disturbance and no disturbance of the sites. These are 4 wildlife openings (1-68-14 and 1-130-26 are being mowed, 1-86-44 is being allowed to regenerate naturally, and 2-38-14 is being planted).

APPENDIX C "Changes_EA" RESPONSE TO PUBLIC COMMENTS AND SINCE 6/24/2010 (Appended to RESPONSE TO SCOPING AND BEFORE (KRM EA) in the 6/24/2010 KRM EA)

(Comments 45 and 46 came before the 30-day Public Comment period.)

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45. LLBO THPO (Gina Lemon) - letter - 3/1/2010 (PR# 428) (reply appended)

45.1 Star Island Toilet:

... provided efforts are made to put this facility as far back as possible from the trail as not to interfere with cultural landscape.

(Forest Service Reply: Within the bounds of the heritage resource surveys conducted and the physical conditions at the site, we will place the toilet as far from the trail as feasible.

This response was in reply to our letter of January 21, 2010 (PR# 381a) which stated: "The Forest has resumed consideration of the need for a permanent toilet on the Windigo Lake Portage on Star Island. We again request your review and comment on this undertaking under Section 106 of the National Historic Preservation Act. The project area is inside of Leech Lake Reservation boundary. ... At this time, we believe that no historic properties will be affected by this project.)

46. Norma Ducheneaux - Sugarbush LIC - e-mail - 4/20/2010 (PR# 456 and 457)

46.1 KRM project:

I am writing to find out about the concerns we had in the northern part of Leech Lake Reservation where we reside. Our committee is wanting some answers about our meeting we had in January 2010. Can you give us an update? We surely appreciate your time on this. We have not heard anything from anybody, whether it be the Forest Service or the Reservation/DRM. I figured it would be the Forest Service before the DRM would make any decisions. Thank you for your time.

(Forest Service Reply: We have been working on the analysis of the Kitchi Resource Management EA ever since we met with you in January. We should be sending out the EA in 2 to 3 weeks, I hope. No one has seen the EA yet, since it is still in very rough draft form.

We took all of you concerns into the EA and in January we modified the alternatives, somewhat. Alternative B is still the maximum volume alternative and changed very little due to the meeting. Alternative C has

had several stands deferred or the prescriptions changed due to the consultation process, but it is still much like our past proposals. Alternative D had several more stands deferred or modified due the consultation in the January meeting and is close to meeting your concerns, while still managing according to the Forest Plan. There are several tables in the EA that you will see, that show how stands were deferred or modified between alternatives due to your concerns. I think that just about every stand you mentioned specifically in the meeting was deferred or modified in Alternative D, with some of these same changed being made in the other alternatives as well. Obviously there is also Alternative A. the no actions alternative that would have no harvesting or other treatments.

I look forward to meeting with your LIC again once the EA is done and available for review, so we can discuss how we dealt with your concerns and your feelings about what the final decision should be.)

47. LLBO (Steve Mortensen) - e-mail - 6/30/2010, 7/19/2010, and 7/21/2010 (PR# 506, 520, 522, 526, 533)

47.1 Kitchi BE:

Can you send us a copy of the BE for the Kitchi Project?

(Forest Service Reply: Steve sent the email just to me with no followup to Cory or Linda (as specified in the Public Comment Letter), so the message was not seen until Leo returned on 7/19/2010. Cory had not sent a copy of the BE to Steve as of yet so copies of the two BEs (Animals and Plants) were sent by e-mail on 7/19/2010.)

47.2 Kitchi Meeting:

We would also like to set up a meeting with you sometime in mid July to discuss the project. Do you have anything available the week of the 12th? {on 7/21/2010} ... he just saw my note today. He said they are working on a letter now, but this week doesn't look good for a meeting. He and the others will decide if a meeting is needed, even though it will be after the 30 day period. He will get back with me about a time ...

(Forest Service Reply: Steve sent the email just to me with no followup to Cory or Linda (as specified in the Public Comment Letter), so the message was not seen until Leo returned on 7/19/2010. On 7/19 we sent an e-mail setting out the dates we were available. It was not until 7/21 when I called Steve by telephone, that we heard that the LLBO e-mail system had not been working, so Steve did not see the message until then. We will wait and see what they say.)

48. LLBO - Levi Brown - telephone - 7/5/2010 (PR# 513a, 521)

48.1 Disclosures in EA:

... received a call from Levi with the band and he was upset that the public has access through our NEPA documents to information about what the Band may do on certain USFS lands. ... He feels that the information was not public but was a Government to Government consultation and should not be viewed by the general public.

(Forest Service Reply: When we took comments from the DRM and the LICs, we documented those concerns and indicated stands that would be dropped or modified based on tribal input and concerns such as gathering or hunting, etc. For future reference, we will be more general in our wording, using "Tribal considerations" or "Tribal consultation" rather than the more specific resource being used.)

49. Ed Fairbanks - telephone - 7/8/2010 (PR# 517)

49.1 Request copy of EA:

He called Neil Peterson in the S.O. and requested a copy of the Kitchi EA on a CD.

(Forest Service Reply: Cory mailed a copy of the EA on a CD to Ed on 7/8/2010.)

50. MN DNR - Jack Olson - telephone - 7/14/2010 (PR# 518, 518a)

50.1 EA on Web?:

He asked if the Kitchi EA was on the Chippewa National Forest web site.

(Forest Service Reply: We checked and found out that the EA had not been put on the website. The S.O. will put it on today.)

51. Buck Lake/Sugar Bush/Mission LIC (Nancy Beaulieu) - letter - 7/21/2010 (PR# 530)

51.1 Which LIC:

From: Sugar Bush/Buck Lake Citizens (Band Members: Leech Lake Indian Reservation), however the return address on the envelope was for Buck Lake/Mission LIC

(Forest Service Reply: It is unclear exactly which LIC this letter came from, other than it having Nancy Beaulieu's signature. Reading the letter and the stands that are in question, it appears that this is from Sugar Bush LIC.)

51.2 Which Stands:

This letter is in response to the proposed cuts that are scheduled to take place within the Chippewa National Forest that border Beltrami county road 20 as these scheduled stands encase our villages and surrounding communities and such said cutting would alter our environment and our traditional way of life.

(Forest Service Reply: It appears from the wording that the only stands this letter refers to are the ones near County Road 20. Most of these are in the Leech Lake Band of Ojibwe's Areas of High Interest. These include:

Dist	Comp	Std	Acres	Alt B Prescription	Alt. C Prescription	Alt. D Prescription
1	129	102	13	Clearcut, plant red pine	Thin red pine	Thin red pine
1	130	44	5	Clearcut jack pine, burn for natural jack pine	Deferred after consultation with LLBO	Deferred after consultation with LLBO
1	133	15	11	Thin aspen to regenerate it in black ash stand	Thin aspen to regenerate it in black ash stand	Deferred after consultation with LLBO
1	137	2	22	Thin for fuels reduction	Thin lighter for fuels reduction after consultation with LLBO	Deferred after consultation with LLBO
1	137	7	55	Thin for fuels reduction	Thin lighter for fuels reduction after consultation with LLBO	Deferred after consultation with LLBO
1	137	8	33	Thin for fuels reduction	Thin lighter for fuels reduction after consultation with LLBO	Deferred after consultation with LLBO
1	137	52	20	Thin for fuels reduction	Thin lighter for fuels reduction after consultation with LLBO	Deferred after consultation with LLBO
1	137	57	8	Thin for fuels reduction	Thin lighter for fuels reduction after consultation with LLBO	Deferred after consultation with LLBO

)

51.3 Traditional Use is Priority One:

It has always been our community's understanding that these proposed stands are to be managed in a manner that entails the best interest of the livelihood of the persons dwelling in these proposed stands of forest. The forest provides for our peoples' livelihood in many ways that must be considered and recognized before any cutting in these stands takes place.

(Forest Service Reply: We are striving to meet trust obligations and maintain or enhance traditional resources while actively managing the National Forest and meeting the Forest Plan objectives. The

Forest does not feel these are mutually exclusive, but that we can accomplish both within the Project. The forest does provide opportunities to hunt, fish, and gather traditional resources in a variety of locations within and outside of Areas of High Interest.

A respectful government-to-government relationship is recognized between the Federal Government and the Leech Lake Band of Ojibwe. This means the Forest provides opportunities for traditional American Indian land uses and resources, and facilitates the exercise of the right to hunt, fish, and gather as retained by Ojibwe whose homelands were subject to treaty in 1855 (10 Stat. 1165). Ongoing opportunities for such use and constraints necessary for resource protection are reviewed and determined in consultation with the Leech Lake Band of Ojibwe (Forest Plan, D-TR-3, pg 2-35). Specific considerations for each project are identified and discussed through meetings with Local Indian Councils, and the LLBO Division of Resource Management personnel.

All forest management alternatives and activities incorporate tribal cultural resources, values, needs, interests, and expectations (Forest Plan D-TR-1, S-TR-3, 4, 6, G-TR-3, G-TR-4, pages 2-35, 2-36). Traditional resources and gathering rights receive high consideration. We try to balance these trust responsibilities across the Forest's multiple uses and diverse resources while moving toward meeting Forest Plan desired conditions.

The pine stands adjacent to the Flora Lake community are proposed for management to protect the community from wildfire. After further consideration, this appears to be a good candidate for a Tribal Forest Protection Act project, with buffers of untreated forest left adjacent to the community, most likely only harvesting strips near the highway. There are about 120 acres of old jack pine, mixed with middle-aged red and white pine, which is in a condition that would allow crown fires to start and carry. In the EA it was analyzed for two types of thinning plus no treatment. Alternative B is a row thinning that reduces fire hazard but also leaves straight open rows and disturbs the traditional resources (plants) the most in the harvested rows, but less than Alternative C between these rows. Alternative C reduces fire hazard with a thinning that reduces the basal area and retains trees in a more random pattern, leaving fewer large areas of direct sunlight to the ground but probably impacting more area with vehicle tires since they are not confined to defined rows. Alternative D defers the thinning, dropping the immediate impacts to the resources, but also not decreasing fire danger and not making provisions for future resource development. The lighter thinning in Alternative C and the deferral in Alternative D are due to concerns and comments from the Sugarbush LIC and DRM during the January meeting with them.

After an ID Team fieldtrip on August 9 and further discussions of the Band's comments in this letter, it was determined that we could accomplish the fire protection by only treating a strip of trees near the highway, leaving the remainder of the stands near the community untreated; which will be Alternative C (modified) in the Decision Notice/FONSI. The intent of the proposed action in those stands is to reduce the wildfire fire danger to the community. Accidental ignition along the road would carry fire through the stands as they are now, quickly and with high intensity, reaching the crowns of the trees and causing considerable mortality and danger to the community south of these stands. By thinning parts of the stands and reducing surface and ladder fuels, the fire would less likely be stand replacing, would move slower through the forest floor of the stands, would burn with less intensity, and would better protect the community from catastrophic fire damage. We feel thinning these stands is still the best course of action. Thinning and fuels treatments will be proposed but modified to have less of an impact to the livelihood of the adjacent community. Thinning and fuels treatments will be proposed for a specified distance along the roads, where the most likely source of ignition would occur. Fire would move slower through the stands, giving more time for firefighters to attack the fire. It would leave the forests immediately adjacent to the community as they are.

The stands north of Highway 20 are being managed for a number of different forest types (aspen, ash, pine) by a number of different management techniques (clearcut and thinning). In most of them there is an increase in the percentage composition of long-lived species due to the retention of most of the northern hardwoods during the harvesting. They are also moving the Forest toward the Forest Plan's desired

landscape ecosystem conditions and setting a course toward future traditional resource gathering in these particular stands. There are some immediate negative effects on some resources in these stands but conditions resulting from the harvesting create conditions favorable to regeneration and reinvigoration of the forest's understory, as well as providing for more stand diversity.

North of the highway (here and elsewhere) in the project and on the District, we are moving many aspen stands toward northern hardwoods. Many of the aspen stands are not pure aspen. They contain hardwood species that are longer lived and which may be more desirable for tribal uses. By cutting aspen and leaving hardwoods, we are moving the forest type from aspen to hardwoods. It may take several entries to reach this long-term objective. In the DMPO LE, it may take 75-100 years before a stand moves from aspen to northern hardwoods without disturbance (Forest Plan FEIS, App. G, p. G-9). We are working toward greater diversity following Forest Plan guidelines, and creating many multi-aged stands from single age monocultures.

The goals and objectives of the Forest Plan and this project is to ensure a diversity of trees, shrubs, and herbs; restore ecological processes and components that contribute toward vegetation objectives for composition, age, and spatial patterns; to maintain and restore habitat for federally threatened, endangered, or sensitive species; and to contribute to productive and resilient native vegetation communities. In the process of achieving these goals and objectives, it is anticipated that species of cultural and gathering importance would also be maintained on the landscape, although it is recognized that the abundance and distribution may change in the short and long term as a result of management goals.

Analysis in the EA and supporting documents describes how proposed treatments would affect cultural resources. The EA acknowledges that some unknown traditional use species and gathering opportunities may experience short-term losses and that actions may cause some traditional gatherers to seek alternative gathering sites. These documents also note that treatments will provide some immediate benefits for some species of plants and animals and favorable long-term benefits, while also providing immediate opportunities for fire wood collecting. (See Tables 2.5.a and 2.5.b plus Section 3.3 in the EA and the Changes EA.)

51.4 Hunting:

These proposed stands have been hunted by many generations of our people and continue to provide subsistence for many of us today. The subsistence that we are dependent upon includes deer and small game. The wooded lakeshore also affords a trapping season for some of our people.

(Forest Service Reply: We recognize the value of the area for subsistence. Our management, while aiming toward Forest Plan goals, is also designed to benefit this use.

Habitat for game species (deer, rabbits, grouse, etc) can be found in a variety of forested and non-forested habitats throughout the KRM project area. Maintaining a mix of forest types and age classes is important for maintaining habitat for these species across the landscape. The KRM project is designed to maintain/increase stand diversity across the landscape. Thus, the KRM project would maintain/increase hunting opportunities within the project area.

Regenerating mature aspen stands increases the amount of preferred early successional habitat for species such as grouse, woodcock, and deer, and consequently, more of these animals that are available to hunters. Within the Kitchi EA area, we are counterbalancing the aspen clearcuts with proposed actions that facilitate conversion of the stand to longer lived forest types, which provide other hunting and gathering opportunities.

Shorelines are seldom harvested, with a 100 and 200 foot riparian buffer prescribed by the Forest Plan. There is no shoreline in these stands, although there is harvesting elsewhere, especially along the Mississippi River.)

51.5 Gathering in the Forest Understory and Overstory:

The people of Leech Lake use the forest beds and bushes for gathering purposes, which include berries, tea, and plants used for cultural/medicinal practices. In addition, the canopy of the forest is absorbed spirituality into the hearts and souls of our people as part of our traditional practices.

(Forest Service Reply: (See the discussion of gathering and trust responsibilities in Comments 51.3 and 52.5 also.)

We acknowledge that this area and the Forest are important for traditional uses.

With variations in forest canopy come variations in gathering opportunities. Dense canopies provide gathering opportunities for those plants that require a shaded or partially shaded condition, such as high bush cranberry, and sugar maple. While open canopies and disturbance such as logging and burning provide gathering for plants that require open canopies, such as blueberry and raspberry. We do not want to eliminate any of these opportunities. The Forest Plan's long term desired condition is to have all these opportunities continuing to exist at sustainable and regular instances across the forest. We do not want to see gathering opportunities lost to the Band. The needs of the Band are very important, and opportunities that allow for the continuation of traditional values would continue to be met.

The EA and project record acknowledge that some traditional use species and gathering opportunities may experience short-term losses and that actions may cause some traditional gatherers to seek alternative gathering sites. The tables in the EA in Section 3.3 discuss individual species (plant & animal) responses to treatments - some negative and some beneficial.

The goals and objectives of the Forest Plan and this project are to ensure a diversity of trees, shrubs, and herbs; restore ecological processes and components that contribute toward vegetation objectives for composition, age, and spatial patterns; to maintain and restore habitat for federally threatened, endangered, or sensitive species; and to contribute to productive and resilient native vegetation communities. In the process of achieving these goals and objectives, it is anticipated that species of cultural and gathering importance would also be maintained on the landscape, although it is recognized that the abundance and distribution may change in the short and long term as a result of management activities.

The district ranger is striving to strike a balance implementing the Forest Plan among the interested parties and the issues they raise at the site or project level. The Leech Lakes Band's concerns are among these sometimes competing interests. We recognize that to the Forest Plan objectives we aren't able to resolve all concerns or reach 100% agreement.

The District Ranger recognizes that tradeoffs are inherent in actively managing vegetation in a dynamic landscape. The documentation within the EA reflects that the tradeoffs were not unknown or unfamiliar; that short term and long term effects, including benefits were understood; and that resources and species were being provided in an environmentally sustainable manner for the long term.

The ID Team was actively seeking to improve within-stand diversity of trees, shrubs, and herbs and recognized the importance of providing mature habitat on the landscape. The purpose of and need for action notes objectives including (1) increasing the use of fire to help restore the diversity of shrubs and herbs, (2) contributing to vegetation objectives for composition, age, and spatial patterns by increasing old forest, old-growth, and multi-aged upland forest vegetation communities and, (3) contribute to productive and resilient vegetation communities with intermediate cultural treatments that increase within-stand diversity by planting white pine and other conifers.

Chippewa Forest Plan objectives (Forest Plan, pp. 2-53 through 2-80) for the various LEs were designed with the intent of restoring these ecosystems including the local plant communities. The project attempts to implement a number of treatments that will help restore or maintain these ecosystems. Prescribed fire is expected to bring the landscapes closer to the natural range of variability for vegetation characteristics, increase understory diversity, and benefit some species like blueberries. We also recognize that use of prescribed fire may benefit some species of plants and animals while at the same time have negative impacts on others. The action alternatives promote prescribed fire which appears to be supported by the LLBO. Fire is generally associated with many species of plants that are gathered by tribal members including but not limited to blueberries, fruit species such as pin cherry, wild grapes, sage, wintergreen, and paper birch. Fire plays a significant role in natural systems as a disturbance agent. Fire and timber harvest are a few of many possible disturbances in the landscape (Forest Plan, pp. 2-18, 2-21). Resources and species will be sustained in the long term with prescribed burning.

The Biological Evaluation (BE) documents if suitable habitat is present for Regional Forester Sensitive Plant Species (RFSS) and if they occurred in the project area. Analysis shows the project was not likely to contribute to a trend towards federal listing or loss of viability of these plant species. These findings indicate that the project will not negatively impact local RFSS plant communities and in some cases will positively benefit native plant communities.

In 2006 and 2007, the Chippewa NF contracted with the Leech Lake Band of Ojibwe for native woody seed collection to increase their seed bank for woody species. The Tribe collected hawthorn fruit, eastern larch cones, mixed acorns, northern white cedar cones, June berries, pin cherries, and American mountain ash. The Chippewa NF also purchased black chokeberries and high bush cranberries. From these collections, seedlings or seed will be sown to increase the amount of fruiting shrubs across the landscape.)

51.6 Mammals:

These stated forests provide a food source for our people. They also provide habitat for animals we rely on such as the whitetail deer and snowshoe hare. Past forest management has led to the increase of whitetail deer which causes them to over-browse the seedlings of the white pine. Other mammals [sic] important to our lifestyle, which due to past management practices, has changed the balance of the plant and animal communities. The proposed management actions will continue to interfere with our traditional [sic] lifestyles.

(Forest Service Reply: (See the discussion in Comment 51.4 also.)

As stated in the reply to 51.4, the KRM EA projects are designed to maintain/increase stand diversity across the landscape. The KRM project is based on the 2004 Forest Plan's Landscape Ecosystem Objectives which take a more balanced approach to forest management than previous projects (prior to the 2004 Forest Plan) that occurred in the project area. As a result, the KRM project will move the project area towards more balanced long-term ecosystem based objectives, which will in turn result in diverse habitat for a multitude of wildlife species including wildlife species important to the LLBO.

Clearcuts, seed tree cuts, and shelterwood harvests create habitat and are a major source of food and habitat for deer, rabbits, grouse, and other game species. Adequate amounts of mature and older forest distributed across the landscape, as reflected in our patches, provide habitat for other species.

Deer browsing on white pine is a known and acknowledged problem across northern Minnesota. Animal damage control is proposed in each of the alternatives. The Forest Service has no control over managing deer populations. (See discussion in Comment 52.14 about game management and regulations.)

51.7 Bald Eagles:

Leech Lake has the highest nesting population of Bald Eagles in the lower forty-eight states of North America, eagles prefer white pine to red pine. It is already an established fact that Bald Eagles have a preference to build

their nest below the top of the crown in living white pine trees. As our people consider the Bald Eagle to be sacred, we urge that their preferred nesting areas remain undisturbed.

(Forest Service Reply: Bald eagle nests in the KRM project area are managed under the Forest Plan and the National Bald Eagle Management Guidelines (USFWS 2007, PR# 131)). These guidelines provide protection buffers, timing restrictions, and management guidelines for bald eagle habitat and nests within these buffers. These management guidelines apply to 5 nests in the KRM project area.

Eagles, although delisted from the Threatened and Endangered list in 2007, also continue to receive protection under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act. These conservation measures are supported by the Forest Plan through objectives provided at the landscape ecosystem scale that provides habitat for their nesting, their roosting, and their prey base. In addition, nests are commonly found along lake shores. Lake shores are usually not managed for timber production due to riparian value, presence of sensitive plants, and scenic values.)

51.8 Old Red and White Pine:

Our forest has already experienced enough of the heavy-handed cuts in the past. The proposed cuts will continue to destroy our white/red pine of which we have very little left. It takes many years to replace these trees and the impact will be felt for generations to come.

(Forest Service Reply: Cuts in red and white pine are composed of many harvest types in the KRM EA area but only 1 or 2 stands are converted to another forest type (jack pine, which is another preferred/desired species). Alternative C (the Proposed Action) has only 2 red pine clearcuts, one regenerated to red pine and one converted to jack pine. The other 58 red and white pine harvests are thinnings and intermediate cuts that keep the red and white pine types and the older age classes. Alternative B has 14 red pine clearcuts regenerated to red pine and 2 converted to jack pine. The other 45 red and white pine stands harvested are thinning or intermediate cuts that keep the red and white pine types and older age. Alternative D is similar to Alternative C but defers one of the red pine clearcuts and 2 of the red pine thinnings.

The 2, 14, and 1 clearcuts, in Alternatives C, B, and D respectively, will take many decades to again become mature red pine (or jack pine), but to maintain a diversity of forest age classes over the long-term, it is necessary to regenerate stands of pine. Otherwise all of the timber stands will become mature at roughly the same time and there will be no young stands to replace them.

This combination of harvest types will lead to a diversity of ages and species within LEs. By changing the forest structure we are building in resiliency to damage from insects, diseases, and fire.

Of the 2,146 acres (171 stands) of mature and older red and white pine in the KRM EA area, only 31 acres of red pine (5 stands) and none of the white pine border Highway 20 near Flora Lake in this project area and we are harvesting 13 acres in one of these:

Dist	Comp	Std	Acres	Alt B Prescription	Alt. C Prescription	Alt. D Prescription
1	129	102	13	Clearcut, plant red pine	Thin red pine	Thin red pine

Thus most of the cutting is thinning which retains most of the character, forest type, and age of the existing stands. It allows the trees to grow larger faster and gets more sunlight to the understory which allows those plants to grow more vigorously. There is some ground and understory plant disturbance from this harvesting but not as much as in a clearcut.

Our Forest Plan recognizes the need for older red and white pine on the landscape. This is reflected in Management Indicator Habitat 7 and the direction to "Maintain at least 40,000 acres in mature or older red and white pine forest types..." (Forest Plan p. 2-32). When that objective is met, the Forest Plan provides the latitude to regenerate red pine using clearcuts or other harvest types (FEIS, Volume II, p.

B-15). Because so many of our red pine stands are 30 to 80 years old, commercial thinning is a common treatment.)

51.9 Sacred Stands:

These forests are held sacred by many of our people. We depend on these resources, they must be managed for our survival.

(Forest Service Reply: Stands that are known to be used specifically for sacred purposes or to have spiritual values will be considered by the district ranger in his decision on this project, and will normally be deferred from treatment. Several of the stands deferred in Comment 52.1 were deferred for this reason after consultation with the LLBO DRM and the Sugarbush LIC. The district ranger is striving to strike a balance in implementing the Forest Plan objectives among the interested parties and the issues they raise at the site or project level. The Leech Lakes Band's concerns are among these sometimes competing interests. We recognize that to meet the Forest Plan objectives we aren't able to resolve all concerns or reach 100% agreement.)

51.10 Corporate Logging:

Consideration to corporate logging must be rejected. Furthermore, the logging industry will only replace our white/red pine with aspen to ensure that they can have a future commodity crop growing for future harvest and clear cutting.

(Forest Service Reply: Under these alternatives, there is no conversion of red or white pine to aspen. The discussion in Reply 51.8 shows that there will be little change in the amounts of red and white pine due to the timber harvesting. The only stand harvested along Highway 20 is a red pine thinning that will leave the stand as red pine

Stand treatments are determined by stand age, existing conditions, and meeting Forest Plan objectives for age and species objectives for the landscape ecosystems. Providing for commodities is also an objective and finding the resource balance for all interested parties is the challenge.

The district ranger is striving to strike a balance in implementing the Forest Plan among the interested parties and the issues they raise at the site or project level. The Leech Lakes Band's concerns are among these sometimes competing interests. We recognize that to meet the Forest Plan objectives we aren't able to resolve all concerns or reach 100% agreement.

The Chippewa National Forest Plan incorporates the five main multiple uses of all national forests, under the Multiple Use Sustained Yield Act (timber, wildlife/fish, watershed, outdoor recreation, and range). Timber industry is interested in how we meet the following objective: Providing commercial wood for mills in northern MN.)

51.11 No Harvesting:

As of date, our community rejects the proposed cutting of such stands in our neighborhood. We are compelled to voice that we are against the rapping of our forest, which in turn, strips away at our culture. We are requesting that input and consideration of our desires and beliefs takes place prior to any movement towards clearing the prescribed stands.

(Forest Service Reply: In our meeting in January, your views were clearly expressed, as well as your desire to have no harvesting in the Kitchi EA area (See Comment 40.3). (See all of the reply to Comment 40 for our explanation of why we are still proposing harvesting and other treatments in the Kitchi EA area.)

Subsequent to that comment, during the 30-day notice and comment period, the same table of stands was again brought forward with the request to defer harvesting in most of the stands. We took a harder look at each of these stands and went on an ID Team field trip to look at nine of them on August 9. Due to this there were more deferrals and modifications of these stands as shown in Table 52.1_reply.

(See also the response to comment 51.3 which discusses the treatments near Flora Lake.)

We appreciate your comments. Among the alternatives in the KRM EA, we did analyze the effects of reduced treatments due to consultation with you and the DRM (Alternative D) and the effects of no harvesting and no other treatments (Alternative A). These will be considered by the Deciding Officer when he makes his decision.

The Forest Plan and Record of Decision for the Forest Plan identified timber harvest as the primary tool for accomplishing the range of vegetation objectives in the Forest Plan. We are striving to meet trust obligations and maintain or enhance traditional resources while actively managing the National Forest. The Forest does not feel these are mutually exclusive, but that we can accomplish both within the Project. The forest does provide opportunities to hunt, fish, and gather traditional resources in a variety of locations within and outside of Areas of High Interest.)

52. Leech Lake Band of Ojibwe, DRM (Bruce Johnson) - letter - 07/26/2010 (PR# 538)

52.1 Specific Stands Requesting No Treatments:

The Leech Lake Reservation Division of Resources Management (DRM) has reviewed the Environmental Assessment for Kitchi Resource Management and like in our previous correspondence and meetings we continue to have issues with the proposal. Although a few stands were dropped and some minor modifications made to others, you have not met your obligations to protect the band's trust resources. Our most fundamental issue is that you propose to harvest in a number of stands that have been identified by tribal members as being utilized by them for traditional gathering and spiritual purposes. These stands are once again outlined in the table later in this document. Proposed harvest is likely to negatively affect tribal member quality of life by reducing or eliminating the resources tribal members use or alter their ability to gather in these stands. This is unacceptable. {Last two sentences moved to Reply 52.2.)

Stands we have requested dropped due to traditional gathering activities.

Comp	Stand	Location	Issues
37	4	N of Bel. Co. Rd. 12	Active sugar bush, used ... for educational purposes.
36	8 & 9	ENE of Andrusia	Light thin only, retain character of stand
140	9	Burnt out Bridge Rd.	Old growth pine ... [with high tribal interest]. Area is already degraded by previous harvest. Keep out of this stand.
140	11	Burnt out Bridge Rd.	Moderate thin of young pine to promote diversity would be OK.
140	13	Burnt out Bridge Rd.	Utilized by tribal members for hunting, light thin ok, not over 25%, if you won't do this, leave stand alone.
128	18	Burnt out Bridge Rd.	Moderate thin of young pine to promote diversity would be OK.
128	48	Burnt out Bridge Rd.	Utilized by tribal members for hunting
128	14	Burnt out Bridge Rd.	Utilized by tribal members for hunting
133	15	Belt. Co. Rd. 20	Adjacent to tribal lands used for hunting and gathering, no harvest in this stand
133	52	Belt. Co. Rd. 20	Adjacent to tribal lands used for hunting and gathering, no harvest in this stand
137	8	Flora Lake Tribal Community	Adjacent to tribal lands used for hunting and gathering harvest will negatively affect gathering opportunities. No harvest. (Part of stand is actually tribal land.)
137	2	Flora Lake Tribal Community	Adjacent to tribal community used for hunting and gathering. Harvest will negatively affect gathering opportunities. No Harvest

137	7	Flora Lake Tribal Community	Adjacent to tribal community used for hunting and gathering. Harvest will negatively affect gathering opportunities. No Harvest
137	51	Flora Lake Tribal Community	Adjacent to tribal community used for hunting and gathering. Harvest will negatively affect gathering opportunities. No Harvest
137	52	Flora Lake Tribal Community	Adjacent to tribal community used for hunting and gathering. Harvest will negatively affect gathering opportunities. No Harvest
131	1	Hales Rd	We believe there is an archeological site at this location
129	87	Meadow Lake Trail	Maple Basswood with scattered aspen. If you clearcut it you will have another aspen stand. You are supposed to be reducing aspen. Change to single tree harvest to retain maple basswood.
15	29	Grandpa's Point	[High tribal interest] The proximity of this stand to the Point would have a negative impact on this location. Part of proposed harvest encroaches into a Unique Biological Area at Grandpa's Point. Please remove this stand from the Kitchi Project.
39	27	Mission Community	The community is opposed to clearcutting of these stands, you need to meet with them and discuss these stands.
39	55	Mission Community	The community is opposed to clearcutting of these stands, you need to meet with them and discuss these stands.
12	7 & 65	Third River Bridge Area	Traditional gathering by Leech Lake Band members is especially high along the river. Due to the proximity to the Mississippi River, Leech Lake Trust Land and high volume of gathering in this area, we formally request that these stands be removed from the Kitchi Project.
26	178 & 1		[High tribal interest] Any cutting in this area would be a travesty and show a lack of cultural sensitivity by CNF. These cuts cannot be allowed and should be removed from the Kitchi Project.
13 14	18, 25, & 27 10 & 8		These stands are in close proximity of the Mississippi River and will negatively impact the water quality of the River. A drop in water quality would negatively impact Wild Rice beds growing in the river—of which Leech Lake has sole jurisdiction over. Any action that could diminish the wild rice resource of the Leech Lake people cannot be allowed. It is the responsibility of the CNF to ensure that all resources are protected throughout the boundaries of the CNF. ... Furthermore, these areas are of high scenic value to both the people of the area and the eco-tourists who visit annually.

(Forest Service Reply: These 30 stands are treated quite differently in each of the three action alternatives as shown in Table 52.1_reply that follows.

Alternative C responded to about half of the concerns (5 concerns by deferring the treatments and 9 by modifying the treatments to be less impactful) where it was obvious that our treatments would negatively impact the traditional uses of the lands. The prescriptions in the other 16 stands were not changed due to the consultation with the LLBO. The original prescriptions were retained because we felt that the benefits of treatments over-weighed the negative effects, e.g. increasing white pine and long-lived hardwoods along the Mississippi River. Later, based on the results of the fieldtrip which took tribal consultation concerns into consideration, Alternative C (modified) was created by having five more

treatments deferred, one more modified, and five of the treatments that had been different from Alternative B are modified even more to have less impact on resources.

Alternative D meets all of the concerns expressed by the LICs and DRM, with light thinning where they said it was okay, deferrals where they desired them, and thinning where we can avoid the heritage site.

Alternative B responded to only two of the concerns with deferrals in special areas. This alternative is designed to harvest the maximum amount of timber from the area, so obviously will have more impacts, as the analysis shows. To eliminate all 30 of these stands from this alternative would defeat the purpose of having it.

The treated stands in Compartments 12, 13, and 14 border the Mississippi River and are of concern to the LLBO. However the prescriptions were all retained unchanged due to the consultation and fieldtrip. The reasoning behind this is as follows. They are all within the Mississippi River Unique Biological Management Area (UBA). The Forest Plan direction in the UBA is to conserve and enhance the values that make them unique, such as native plant communities, old-growth characteristics, native habitat, and visual quality. This direction can be followed in these stands to help push them toward long-lived forest types by keeping the group selection cuts small in size, widely dispersed throughout the stands, and held back from the river. This would address the visual quality issue as well as the water quality. These stands also have steep slopes near the river that drop down to the floodplain. Staying off this slope and also staying back away from this slope as necessary for the prescribed filter strips will also protect water quality and visuals. Minnesota Forest Resources Council's monitoring over the past several years has shown that adherence to filter strip guidelines near waterbodies is high (over 90%) and effective at preventing erosion of sediment and transport of sediment into adjacent waterbodies. (PR# 191a and Minnesota Department of Natural Resources, 2010. Timber Harvesting and Forest Management Guidelines on Public and Private Forest Land in Minnesota, Monitoring for Implementation, 2009.) They all need more conifers to meet Forest Plan guidance. So, reducing the aspen/birch component in order to release the hardwoods and open up the stands for young pine would definitely help.

(See also the response to Comment 51.5.)

As we said in the Response to Comments in the EA, the stand they called Comp 137 Stand 51 should have been Stand 57.

Table 52.1_reply -- Reply to "Stands we have requested dropped due to traditional gathering activities." *
(reorganized in numerical order and added District)

Dist	Comp	Stand	Alt B Prescription	Alt. C Prescription	Alt. D Prescription	Changes to Alt. C after Public Comment, becoming Alt. C (modified)	Concern from above	Analysis of Reason for Prescriptions
1	128	14	2-aged cut, convert to Northern hardwoods	2-aged cut, convert to Northern hardwoods and white pine after consultation with LLBO	Deferred after consultation with LLBO	Deferred after consultation with LLBO and a fieldtrip	Hunt	Fieldcheck showed this to be a nice park-like northern hardwood stand with some overmature aspen. Won't change much if not cut this decade. Alt. B meets Forest Plan by moving toward long-lived species (northern hardwoods) and reduces the amount of aspen.
1	128	18	Thin	Thin lighter after consultation with LLBO (20 BA higher)	Thin lighter after consultation with LLBO (20 BA higher)		light thin is okay	Higher retained BA in Alts. C and D to be less impactful (20 BA higher).
1	128	48	Clearcut to aspen	Deferred after consultation with LLBO	Deferred after consultation with LLBO		hunt	
1	129	87	Clearcut aspen, reserve NH	Clearcut aspen, reserve NH	Deferred after consultation with LLBO		keep NH not aspen	B and C meet Forest Plan by moving toward more long-lived species (northern hardwoods). Reserving NH will allow larger crowns before aspen regains height.
1	131	1	Thin (buffer the heritage site)	Thin (buffer the heritage site)	Thin (buffer the heritage site)		HR site	As in all cases, heritage sites will be protected by buffering.
1	133	15	Thin aspen to regenerate it in black ash stand	Thin aspen to regenerate it in black ash stand	Deferred after consultation with LLBO	Deferred after consultation with LLBO and a fieldtrip	adjacent to hunt and gather	Fieldcheck showed this to be a middle-aged ash stand with not enough aspen volume for a merchantable sale and unknown future effects of ash borer on ash, so defer in Alt. C also. Tribal lands to west, east (?), and

Dist	Comp	Stand	Alt B Prescription	Alt. C Prescription	Alt. D Prescription	Changes to Alt. C after Public Comment, becoming Alt. C (modified)	Concern from above	Analysis of Reason for Prescriptions
								southeast.
1	133	52	Clearcut (aspen)	Clearcut (aspen)	Deferred after consultation with LLBO	Deferred after consultation with LLBO and a fieldtrip	adjacent to hunt and gather	Fieldcheck deferred the harvest in Stand 15, thus making Stand 52 harvest unmerchantable. Tribal lands to west, east (?), and southeast.
1	137	2	Thin for fuels reduction	Thin lighter for fuels reduction after consultation with LLBO (20 BA higher)	Deferred after consultation with LLBO	Heavy BA thinning in a wide strip along highway (70-80 BA).	adjacent to tribal lands	Fieldcheck showed that treating only a strip along the highway would reduce fire risk enough (200-300'). Untreated buffer by community (1/8 mile), Beaulieu Road (50-100'), and Highway 20 (50-100'). Possible TFPA project.
1	137	7	Thin for fuels reduction	Thin lighter for fuels reduction after consultation with LLBO (20 BA higher)	Deferred after consultation with LLBO	Heavy BA thinning in a wide strip along highway (70-80 BA).	adjacent to tribal lands	Fieldcheck showed that treating only a strip along the highway would reduce fire risk enough (200-300'). Untreated buffer by Highway 20 and gravel road (50-100'). Possible TFPA project.
1	137	8	Thin for fuels reduction	Thin lighter for fuels reduction after consultation with LLBO (20 BA higher)	Deferred after consultation with LLBO	Heavy BA thinning in a wide strip along highway (70-80 BA).	adjacent to tribal lands	Fieldcheck showed that treating only a strip along the highway would reduce fire risk enough (200-300'). Untreated buffer by community (1/8 mile), Beaulieu Road, and Highway 20 (50-100'). Possible TFPA project.
1	137	57 (they said 51)	Thin for fuels reduction	Thin lighter for fuels reduction after consultation with LLBO (20 BA higher)	Deferred after consultation with LLBO	Heavy BA thinning in a wide strip along highway (70-80 BA).	adjacent to tribal lands	Fieldcheck showed that treating only a strip along the highway would reduce fire risk enough (200-300'). Untreated buffer by Highway 20 (50-100'). Possible TFPA project.

Dist	Comp	Stand	Alt B Prescription	Alt. C Prescription	Alt. D Prescription	Changes to Alt. C after Public Comment, becoming Alt. C (modified)	Concern from above	Analysis of Reason for Prescriptions
1	137	52	Thin for fuels reduction	Thin lighter for fuels reduction after consultation with LLBO (20 BA higher)	Deferred after consultation with LLBO	Heavy BA thinning in a wide strip along highway (70-80 BA).	adjacent to tribal lands	Fieldcheck showed that treating only a strip along the highway would reduce fire risk enough (200-300'). Untreated buffer by Highway 20 (50-100'). Possible TFPA project.
1	140	9	Deferred after consultation with LLBO	Deferred after consultation with LLBO	Deferred after consultation with LLBO		High tribal interest.	
1	140	11	Thin	Lighter thin in curvy rows after consultation with LLBO (20 BA higher)	Deferred after consultation with LLBO		light thin okay	Higher BA and curved rows in C to be less impactive.
1	140	13	Shelterwood w/ PB + some WP	Shelterwood w/ PB + some WP	Deferred after consultation with LLBO	Thinning to 75% crown closure to release oak, maple, and pine.	hunt - light thin okay	Fieldcheck showed this to be a mature aspen stand with oak, maple, birch, and pine. Could do a 75% crown closure thinning to encourage/release desirable oak/maple/pine while not encouraging aspen regeneration.
2	12	7	Group selection, thin between, plt WP	Group selection, no thin, plt WP after consultation with LLBO	Deferred after consultation with LLBO	No change.	High tribal interest.	No fieldcheck but assumed to be like stand 65.
2	12	65	Group selection, thin between, plt WP	Group selection, no thin, plt WP after consultation with LLBO	Deferred after consultation with LLBO	No change.	High tribal interest.	Fieldcheck showed nice northern hardwoods with some aspen/birch. Plant WP in groups to increase it along the river.
2	13	18, 25, & 27	Group selection, convert to NH w/WP	Group selection, convert to NH w/WP	Deferred after consultation with LLBO		High tribal interest, scenic, wild rice	Our guidance is to enhance water quality and long-lived species by the river, hence plant WP in groups. We will not affect water quality or scenery by leaving a buffer.

Dist	Comp	Stand	Alt B Prescription	Alt. C Prescription	Alt. D Prescription	Changes to Alt. C after Public Comment, becoming Alt. C (modified)	Concern from above	Analysis of Reason for Prescriptions
								Unless managed, we will not reach Forest Plan guidance.
2	14	8	Thin	Thin	Deferred after consultation with LLBO		High tribal interest, scenic, wild rice	Our guidance is to enhance water quality and long-lived species by the river. We will not affect water quality or scenery by leaving a buffer/filter strip, especially on steep slopes. Unless managed, we will not reach Forest Plan guidance.
2	14	10	Group selection, convert to oak w/RPJP	Group selection, convert to oak w/RPJP	Deferred after consultation with LLBO		High tribal interest, scenic, wild rice	Our guidance is to enhance water quality and long-lived species by the river. We will not affect water quality or scenery by leaving a buffer. Unless managed, we will not reach Forest Plan guidance.
2	15	29	Thin, convert to NH RP	Thinning	Deferred after consultation with LLBO	Deferred due to LLBO consultation.	High tribal interest.	Since this stand is quite important to one group and this whole point is important to the LLBO, we will defer it.
2	26	1	Clearcut (red pine)	Deferred after consultation with LLBO	Deferred after consultation with LLBO		High tribal interest.	Was already deferred in C and D due to tribal consultation. Too much young aspen around this stand. Kept in B for maximum volume analysis.
2	26	178	Clearcut, convert ash to aspen	Deferred after consultation with LLBO	Deferred after consultation with LLBO		High tribal interest.	Was already deferred in C and D due to tribal consultation. Too much young aspen around this stand. Kept in B for maximum volume analysis.
2	36	8	Thin	Lighter Thin after consultation with LLBO	Lighter Thin after consultation with LLBO		light thin okay	Higher BA in C and D to be less impactful.
2	36	9	Thin to increase RP	Lighter Thin to	Lighter Thin to		light thin	Higher BA in C and D to be less

Dist	Comp	Stand	Alt B Prescription	Alt. C Prescription	Alt. D Prescription	Changes to Alt. C after Public Comment, becoming Alt. C (modified)	Concern from above	Analysis of Reason for Prescriptions
			and WP component	increase RP and WP after consultation with LLBO (20 BA higher)	increase RP and WP after consultation with LLBO (20 BA higher)		okay	impactive.
2	37	4	Deferred after consultation with LLBO	Deferred after consultation with LLBO	Deferred after consultation with LLBO		High tribal interest, sugarbush	Deferred early in the process.
2	39	27	Clearcut, convert to JPRP	Clearcut, convert to JPRP	Deferred after consultation with LLBO	Deferred due to LLBO consultation.	LIC opposes clearcut	Due to amount of recent harvest and tribal concerns this close to the community; we decided to defer the harvesting in Alt. C also.
2	39	55	Clearcut, convert to JP	Clearcut, convert to JP	Deferred after consultation with LLBO	Deferred due to LLBO consultation.	LIC opposes clearcut	Due to amount of recent harvest and tribal concerns this close to the community; we decided to defer the harvesting in Alt. C also.

** Deferral means that the stands will not be proposed for treatment in this EA. They will be available for reassessment the next time a project is proposed in the area in 8 to 10 years.)*

52.2 Trust Responsibility:

The Leech Lake Band retains treaty rights on all lands within the reservation---you have trust responsibility to the Band to assure that these resources are maintained and available to tribal members in the manner acceptable to them. The current proposal does not meet this obligation.

(Forest Service Reply: (See the response to comment 51.3 for a discussion of traditional gathering and rights, also.)

The project is tiered to and draws direction from the Chippewa National Forest Plan and Final Environmental Impact Statement (FEIS) which in turn were created and approved in relation to numerous laws including the National Forest Management Act. From the FEIS, "General trust responsibility obligations are in large part met by National Forests through compliance with laws and regulations relevant to federal land management. Examples of such laws include the National Forest Management Act, National Environmental Policy Act, Endangered Species Act, and Clean Water Act, and the National Heritage Preservation Act. All of these laws are intended to protect important natural and cultural resources upon which the nation and all of its citizens depend", including those that are of interest to the LLBO. (FEIS, Volume III p. J-69 and J-72). Many of these laws and regulations include specific provisions for consulting with American Indian tribes. Further, "Treaty and trust responsibilities will be fulfilled as the Forest Plan is implemented under existing treaties, laws, regulations by coordination of management activities with the appropriate local, state, or tribal governments, as well as with other federal agencies, organizations, groups, and individuals." (FEIS p. J-69).

Tribal rights and interests are referenced in several parts of the Forest Plan, Final EIS, and Record of Decision, and in particular, Forest Plan Chapters 1 (p. 1-4), 2 (pp. 2-35 through 2-37), Chapter 3.1 (pp. 3.1-1 through 3.1-15) of the Final EIS, and Appendix J, Response to Comments (J-69 through J-70). These chapters include discussions of the desired conditions, goals, objectives, standards and guidelines in terms of consultation with tribes, and general treaty information. The Final EIS for the Forest Plan, for example, recognizes that band members use and rely upon a wide array of plant and animal resources in treaty areas. The Chippewa NF has a role of maintaining ecosystem health ... "so as to have the overall effect of allowing for continued resource use through Ojibwe hunting, fishing, and gathering activities as reserved by treaty." (FEIS p. 3.1-12). The Chippewa NF recognizes that the federal government has the responsibility to maintain rights retained by treaty. The Forest is committed to the continuation of hunting, fishing, and gathering rights by tribal members on National Forest lands.

The Forest Plan and Record of Decision for the Forest Plan identified timber harvest as the primary tool for accomplishing a range of vegetation objectives in the Forest Plan. We are striving to meet trust obligations and maintain or enhance traditional resources while actively managing the National Forest. The Forest does not feel these are mutually exclusive, but that the Forest can accomplish both within the Project. The forest does provide opportunities to hunt, fish, and gather traditional resources in a variety of locations within and outside of Areas of High Interest.

We took a hard look at each of the stands in Table 52.1_reply and went on an ID Team field trip to look at nine of them. Due to this there were more deferrals and modifications of these stands, as shown in Comment 52.1.)

52.3 Precluding Traditional Gathering:

This proposal also states that 537 acres of forest which supported historic traditional use will be potentially precluded from use and an additional 2044 acres used historically for traditional purposes will be potentially undesirable for gathering. Tribal members are already having a difficult time gathering some traditional resources and this project will make this more difficult. This is a significant amount of land that will be negatively affected, yet there is little or no effort to remove these stands or to provide replacement mitigation for their loss.

(Forest Service Reply: (See also the discussion in Comment 51.5.)

About 2,179 acres in Alt. C (modified) are managed to varying degrees with varying impacts over varying timeframes (2,581 acres was from Alt. C). The environment will be altered, but without knowing the specific species in each area we cannot analyze the specific effects to each species, however we can list the effects that will be felt by species in general as the overstories are reduced, as mechanical equipment disturbs the soil and ground vegetation, or as there are no treatments done. There are obviously some negative effects to many individual plants with the ground and vegetation disturbances; however there are also positive effects on some species with the new conditions. This all depends on the specific species.

The statements quoted above are saying that the acres "precluded from use" are treated by the more impactful harvest types, such as clearcuts; while the acres of "potentially undesirable" are treated by the less impactful harvest types, such as thinning.

The EA and project record acknowledge that some traditional use species and gathering opportunities may experience short-term losses. The tables in Section 3.3 in the EA discuss individual species (plants and animals) responses. Some of the effects are beneficial following treatments. The goals and objectives of the Forest Plan and this project are to ensure a diversity of trees, shrubs, and herbs; to restore ecological processes and components that contribute toward vegetation objectives for composition, age, and spatial patterns; to maintain and restore habitat for federally threatened, endangered, or sensitive species; and to contribute to productive and resilient native vegetation communities. In the process of achieving these goals and objectives, it is anticipated that species of cultural and gathering importance would also be maintained on the landscape; although it is recognized that the abundance and distribution may change in the short and long term as a result of management activities.

Some gathering opportunities may be immediately lost, but new gathering opportunities are created at the same time. The goal of the Forest Service is to provide for the long term condition and health of the forest, by creating diversity in ages and forest types across the entire landscape. Gathering opportunities are temporal, and shift in time and space. As a forest ages over time, gathering opportunities that may have existed in the past in one location are no longer available at that location and we must look elsewhere for that specific gathering opportunity. We are hoping, that in the long term gathering opportunities are improved and all gathering opportunities are available and sustainable across the forest.

It should be noted that there are many treatments designed to enhance traditional gathering, e.g. 45 to 456 acres of underburning/ecosystem burning, increasing jack pine by 13 to 102 acres, 51 acres of riparian area planting, enhancing blueberries on 342 to 617 acres, and 35 to 37 acres of fruiting shrubs in wildlife openings.

There will be no replacement mitigation stands.)

52.4 Controversy/EIS:

In this proposal you have chosen to retain stands for harvest that will likely cause further negative impacts to traditional gathering opportunities for band members, as a result the current proposal remains very controversial, and inadequately addresses many other concerns via this Environmental Assessment (EA). For this reason, it is appropriate to initiate an Environmental Impact Statement (EIS) at this time.

(Forest Service Reply: The three action alternatives differ in how they treat each of these stands that are of concern to the band members, with Alternative D treating few of them.

There is no "controversy" over effects in the Kitchi EA, as defined by NEPA. There are differences of opinion and some people do not agree with the treatments. However "controversy" in the NEPA sense

refers to a difference of scientific opinion over what the effects will be. We know what the effects are, the alternatives just differ in the importance they place on eliminating or changing some of the impacts.

An EIS is not required for concerns you do not feel are adequately addressed. The primary purpose of an EA is to determine whether or not a proposed action could have significant impacts requiring an EIS. The decision on whether an impact might be significant, which therefore would need an EIS, belongs to the deciding officer.

As will be documented in the Decision Notice/FONSI, the District Ranger has reviewed the environmental effects of activities in the Project and has determined that the effects are not significant and do not require an EIS. The proposed activities and the resulting impacts fall within those predicted in the Final EIS for the 2004 Chippewa National Forest Land and Resource Management Plan. The environmental effects of timber harvest are well understood and well documented in the literature, including the Final EIS for the Forest Plan and in this EA. The degree of controversy with regard to effects on the quality of the environment are limited and are not considered significant.)

52.5 Quality of Life:

DMR Staff met with the Local Indian Councils (LIC) from the Buck Lake and Sugar Bush areas on December 14th, 2009, and July 12, 2010 to discuss the proposed actions with tribal members who use other areas. At these meetings we reviewed the proposed actions of the Kitchi Resource Management Project and all tribal members present expressed concerns about the effect of timber harvests on the diversity and health of forest plants and animals, which form the central core our traditional lifestyle. This traditional lifestyle is made of basic things that we claim and use, but can never own---yet, dramatically enrich our quality of life.

The term, **Quality of Life**, is used to evaluate the general well-being of individuals or societies. Adequate definitions and measurements are elusive but many involve both objective and subjective determinants. Some standard indicators include the built environment, physical and mental health, education, recreation and leisure, as well as social belonging.

To the local tribal people, intact forests with little or no mechanical manipulation provide the environment necessary for sound physical and mental health, educational opportunities to share traditional teachings on the proper use of, and respect for, plants and animals, an outlet for traditional recreation and leisure activities, as well as social cohesiveness through social and/or familial events like blueberry picking, in which a blueberry story is shared with younger generations and its gifts honored. When one medicinal plant is lost, its teaching is lost. The stories, the songs, and our way of life associated with that plant are lost. Our philosophy of life as a whole is slowly being depreciated overtime by your forest management actions. As a result, our identity as Anishinaabe people is becoming lost.

Without scientific analysis of these factors and how they relate to traditional life ways and values, it is difficult to quantify the changes experienced socially and psychologically by the local tribal community. Nevertheless, affective enjoyment of our environment declines as “un-priced” or “under-valued” experiences are negatively impacted by economically valued projects, such as timber harvest.

(Forest Service Reply: (See reply to Comment 37.9 in the EA, also.)

Alternatives C and D incorporated some or all of your concerns over treatments in specific stands. Table 52.1_reply shows additional changes in Alt. C (modified) that were made as a result of a recent ID Team fieldtrip along with the results of our consultation with you. The table shows that we have responded to your concerns in all 30 stands that you mentioned.

We are striving to meet trust obligations and maintain or enhance traditional resources while actively managing the National Forest. Forest does not feel these are mutually exclusive, but that the Forest can

accomplish both within the Project. The forest does provide opportunities to hunt, fish, and gather traditional resources in a variety of locations within and outside the Leech Lake Reservation.

Our meetings with Local Indian Councils and LLBO Division of Resource Management are important in identifying and considering resources and specific locations that are important to the tribal community.

General trust responsibilities are in large part met by National Forests through compliance with laws and regulations relevant to federal land management. Examples of such laws include the National Forest Management Act, National Environmental Policy Act, Endangered Species Act, Clean Water Act, and the National Heritage Preservation Act. All of these laws are intended to protect important natural and cultural resources that are of interest to the LLBO. (FEIS, Volume III, p. J-72).

The deciding officer is striving to strike a balance in the NEPA process and in implementing the Forest Plan among the interested parties and the issues they raise at the site or project level. The Leech Lake Band's concerns are among these sometimes competing interests. We recognize that due to Forest Plan objectives, we aren't able to resolve all concerns or reach 100% agreement.

(The discussions in Comments 51.3 and 51.5 also have information on this topic.)

52.6 Traditional Uses are Highest Priority:

Additionally, the type of projects proposed by the Forest Service produce gains experienced by private entities, while the social costs are imposed generally on the local population. This arrangement appears to be in direct violation of federal trust duties, in which competing interests should be balanced with an acute sensitivity and intentional accommodation to traditional tribal interests, and in this case, specific to the local LIC requests.

Through a series of unscrupulous Federal Acts: the Dawes Act of 1887, the Nelson Act of 1889, the Steenerson Act of 1904, and the Burke Act of 1906, a large portion of the land base of the Ojibwe people was unethically sold to logging companies, railroads, and non-tribal settlers. As a result, very little of the Leech Lake Band's original homeland is owned by tribal members. Those lands which were once part of our permanent homeland, but which are currently managed under the jurisdiction of the Chippewa National Forest, should be done so with the needs of its original people **first and foremost**. The "quality of life issue for other members of the public" (page 212, paragraph 2) should be of secondary importance and then addressed only outside of the present Leech Lake Reservation Boundary. The history of this land and its people are not being appropriately considered in the Forest Plan, in general, or the KRM EA, specifically.

(Forest Service Reply: (See also the responses to Comments 51.3 and 52.5.)

During the Forest Plan revision process, tribal consultation took place and tribal interests were considered. Changes were made to better address tribal concerns (ROD, p. 19). The goal of Kitchi EA project was to develop alternatives that reflect the desired conditions, objectives, standards, and guidelines of the Forest Plan. We are trying to meet our trust obligations and maintain or enhance traditional resources while at the same actively managing the National Forest to meet other resource objectives. The most efficient way to meet some objectives is through timber harvesting.)

52.7 ¼ Mile Zone:

In the analysis of the effects of this proposal on tribal members and their communities you have analyzed the acreage of stands within ¼ mile of tribal lands. We have no idea where you came up with this value and it is totally inadequate for the purposes of this analysis. Tribal members conduct traditional gathering at distances much greater than ¼ mile from where they live. Surveys and studies have found that essentially all of the forest within the reservation is utilized to various degrees. A better analysis is needed to address this shortcoming.

(Forest Service Reply: The ¼ mile zone was one of the indicators for Key Issue 2, but the rationale for that distance was not clearly expressed in the EA.

One of the concerns expressed in past DRM and LIC meetings was that treatments were being done adjacent to tribal lands. In order to look at how much of this impact was occurring, the EA counted the number of stands and acres of treatments being done close to tribal lands. Some impacts can be felt from treatments that touch the boundary of that land, while others can be felt for some distance back. A similar analysis of the scenery (Scenic Integrity Objective) uses ¼ mile wide zones along special features; so we also chose to use ¼ mile as a reasonable zone in which to look. It is close enough to hear treatments, see treatments, or walk past treatment. Treatments more than that distance are less likely to be heard, seen, or walked to. Within ¼ mile is where treatments would have the most direct and potentially dramatic effects/impacts on adjacent lands and land owners.)

52.8 Frequency of Re-Entry:

Other issues of concern that are not adequately addressed in the EA are as follows:

There have been 4 projects over portions of the project area over the last 6 years. This is large number of projects for a specific area and for tribal residents to have to endure. ...

(Forest Service Reply: It is true that we have been analyzing and harvesting in this general area twice over the last 10 years. The Cass Lake EA overlapped most of the Kitchi EA area about 7 years ago, with portions of the Rambling Woods, Winnie, and Sand Plain EAs also covering the rest of the Kitchi EA area. However each time we re-analyze the area, there have been changes in vegetation and habitats due to natural growth and to management activities. There was also a change in Forest Plan in 2004. Thus, each analysis is dealing with different conditions and is not a re-doing of the previous analysis. We consider cumulative effects from all past EAs and past treatments on NFS lands as well as on other ownerships.

Our treatments in the KRM area are consistent with the Forest Plan and are designed to implement it. We compare the existing conditions in the KRM area to the Forest Plan desired conditions to see how much treatment by forest type or age class is needed. To meet the goals and objectives of the Forest Plan, in many cases requires a sustained cycle of treatments, e.g. to maintain a certain percentage in the 0 to 9 year age class. Thinning needs to be done periodically to maintain the growth rates on many conifers.)

52.9 Blueberry/Cass Lake EA:

... Furthermore, the blueberry restoration that was promised in the Cass Lake Vegetation EA was never completed. We consider this to have been mitigation from this project, but like many projects, the mitigation has not been successfully completed.

(Forest Service Reply: We need to clarify two things. We did not make any "promises" in the Cass Lake EA; we proposed projects that would be done as funding and resources were available. Burning for blueberries would not be considered mitigation. Mitigation typically refers to activities or measures taken to minimize the effects of an action on a resource. The proposed burning for blueberries was to create desired conditions in selected stands.

We recognize the importance of returning fire to these stands because of the potential benefit to blueberries. In addition, there is an ecological benefit of returning fire to the landscape. Across the Forest there have been prescribed burns that have benefitted blueberries over the years. Which stands are burned depends on the yearly priorities and the amount of funding available. We can only burn a limited number of acres per year.

In the Cass Lake EA Decision Notice we proposed two types of treatments for blueberries.

First, Compartment 137 Stand 54 was to be burned periodically to promote blueberry plant and berry production. Due to funding and funding priorities over the years, this was not accomplished. During the ID Team fieldtrip on August 9, this stand was looked at again. The conditions seen show it to be a high priority for treatment that would enhance blueberry production in that stand. The proposed treatment is to brush (cut the competing shrubs/vegetation) and burn a portion of the stand, and the

other portion would be brushed only. The burned and unburned brushed areas will be equally distributed. By varying the treatments in the stand, we are hoping to get a better idea of what works and to find the best method for enhancing blueberry production in stands across the forest. There would be followup monitoring to see which treatments worked best and how well they worked.

Also, note that there were two other stands prescribed for burning for blueberries from the Sand Plain EA that did not get carried forward in the original proposed action for Kitchi EA (about 8 acres). These are District 2 Compartment 5 Stands 64 and 65 for about 3 and 5 acres respectively.

Since we did not analyze the effects of burning in these three treatments in the KRM EA, we looked at any changed conditions that may have occurred since the Sand Plain and Cass Lake EAs were written, as documented under "Chapter 3" earlier in this "Changes EA" as Section 3.0. They are also similar in effects and nature to the ecosystem burning that is proposed in Kitchi EA, so are within the effects analysis.

Second, there were three large ecosystem burns that were to have small parts burned periodically for blueberry plant and berry production. Again, due to the lack of funding very little of these three ecosystem burns was done and none of the areas for blueberries were accomplished, at least not more than once. These areas were consciously left out of the subsequent Lydick EA, so not carried forward to the KRM EA; plus these stands are not in the KRM EA area.

Both the tribal community and the Forest Service have shown concern for the restoration of blueberry on the landscape. Without fire, blueberry's abundance can decline considerably. Fire historically has played a key role in maintaining blueberry vigor and production. Blueberries need an appropriate balance of light, overstory shade, and soil moisture. If stands are opened up through thinning or regeneration harvests so that sunlight gets to the forest floor, there may be a flush in blueberry plants. Generally, fire and mechanical control are needed to maintain or restore plant vigor and reduce brush competition. There is potential to increase berry production on the drier sandy sites dominated by jack or red pine by burning these sites, but applying fire can be tricky. Due to policies and regulations, burning can only occur when certain conditions exist. As a result burning may only be able to be conducted a few days a year making it difficult to apply fire to all the areas that would ecologically benefit. Burning is much more effective and is preferred over planting blueberries which has not been very effective successful.)

52.10 Surveys of Whole Stands:

In Table 1.2a and page 61 chapter 3, and page 177, 10.5. and elsewhere you discuss treating whole stands even if they are divided by roads, boundaries, etc. Were all the stands submitted for Heritage and TES surveys, and were they analyzed in this EA? If not, they should be dropped from the proposal.

(Forest Service Reply: Yes, these stands were surveyed in their entirety. When the stands were proposed for surveys, we recognized that there were slivers of about a dozen stands and made sure that these stands were surveyed in their entirety, as shown in the PPP list in Project Record 201: "(About a dozen stands on project area boundary were clipped and only slivers of them show inside the project area. We want the entire stands surveyed, not just the slivers inside the boundary; because we will be treating the entire stands. Leo 10/30/2008.)"

52.11 Stand Recovery Time:

In the analysis of effects on Gathering and Traditional Uses, stand recovery time and long-term vision must be considered from forest management activity. This will vary by forest type and resource, and in some cases, like maple-basswood, future recovery is uncertain due to the potential impact of exotic earthworms. Given the importance of this habitat for maple sugaring to the local population, it must be adequately addressed in this proposal.

(Forest Service Reply: We analyzed the cumulative effects of the treatments on each resource. This gets into the recovery time and length of time that effects will be felt. Recovery time is variable depending on the management intensity.

We are designing treatments to increase ecosystem diversity and resiliency. Some of the effects of the treatments are the desired results, not just negative impacts to resources. For example, prescribed burning increases gathering opportunities for many species. Also, we are increasing the amount and acreage of northern hardwood stands to increase the amount of sugar maple. We are following the Forest Plan guidance to increase sugar maple and other long-lived northern hardwoods. We believe that we can more quickly move these stands to later successional stages of forest that were historically more common in this area, but also to improve habitat for some wildlife species, to better meet objectives to increase the amount of pine species, and to also contribute to local economies through timber sales.

We acknowledge that earthworms can negatively impact the potential for sugar maple regeneration. The effects of earthworms on northern forests were minimally addressed in this EA. Research has shown that earthworms can have a detrimental effect on some understory ecosystems by changing the condition of the forest floor. (http://www.nrri.umn.edu/worms/forest/plants_herb.html). The seedling layer in hardwood stands is affected. There is a reduction in natural regeneration due to reduction in seedling survival in infested stands. With little understory regeneration in these infested stands there are some questions as to what will replace these stands as the mature trees continue to age and die.

Sugar Maple and basswood dominated forests appear to be the most negatively impacted by exotic earthworm invasion with the biggest changes in soils, forest floor, and understory plants. (http://www.nrri.umn.edu/worms/forest/plants_herb.html). Staying out of these stands and not managing these stands may not necessarily be the solution to earthworm problem in stands that are already heavily infested. Most research on earthworms has focused on the consequences of invasion at particular sites and less on the mechanisms of invasion and the factors that contribute to or limit invasion (Bohlen, et al, p.433). Research is currently being done to help determine how current management needs to change in these infested stands, and there will likely be a need to adapt current and future forest management practices for sites that have been recently invaded by earthworms, and to prevent uninfested sites from becoming infected. (http://nrs.fs.fed.us/disturbance/invasive_species/earthworms/). Areas that have not been infected or are lightly infected should be identified and measures taken on a stand by stand basis to protect those stands from infestation or further infestation. (Holdsworth, et al, p. 1006). The mitigating measures found in Appendix H of the KRM EA for Non-native Invasive Species would also help to prevent the spread of earthworms between harvested stands.)

52.12 Economics:

Table 3.11.4.1.b Economic Factors it states that under alternative C (preferred alternative) this project will lose \$406,506, and this does not include all the costs or support services that are needed to operate a National Forest. When you add this loss to the damage to trust resources we can see no reason for this project to occur as proposed. This also begs for further analysis under an EIS.

(Forest Service Reply: The economic analysis was done as a relative comparison between alternatives to see how they compared with each other, not to get the total monetary values. The results are not absolute numbers. An economic analysis provides the decision maker with a measure of the differences in the commodity costs and benefits between alternatives. There is no requirement that the most economical alternative be selected. Similarly, the Forest Plan does not allocate forest land for the exclusive purpose of maximizing timber production or economic return. The Forest Plan does require that we implement projects that move the Forest towards meeting objectives that reflect multiple uses and are both commodity and non-commodity in nature. The benefits associated with non-commodity resources are not included in the economic analysis, yet are an important consideration in achieving a balance in resources and multiple resource goals as reflected in the Forest Plan and the Purpose and Need for the project. This was discussed in the EA(PR# 483) that was sent to the public and further

expanded upon in the Specialist Report EA (PR# 480_b) in Sections 3.11.3, 3.11.4.1, and 3.11.4.1.2 Alternative B.

This is the same information that would be included in an EIS, so the results would not change. An EIS is not required for this analysis.)

52.13 Treaty Rights/Nelson Act:

On page 175 where the 1889 Nelson Act is discussed it mentions the Leech Lake Agreement and states “but that’s another story”. This is the court case under which it was affirmed that Leech Lake Band had never relinquished its treaty rights. It would appear that you are ignoring this fact and are being disrespectful to the Band.

(Forest Service Reply: The response was not intended to be disrespectful of the band or of treaty rights. What we were trying to say and do was to address a specific question. The question being answered was, "why the stumpage money does not go to the Leech Lake members." Under the context of the statement we meant to say that the rest of what we were saying was in response to a very specific question about monetary receipts for timber harvests and we did not want to broaden the question to include all of these other factors that were irrelevant to the original question. Some of the information was left in the response in order to set the background for the answer.

*The statement they are quoting above is from the reply to Comment 5.2 in Appendix C of the KRM EA:
" The Nelson Act was never fully implemented, as most Ojibwe did not move to White Earth. Allotments were also taken at Leech Lake, and pine and agricultural lands were sold within the reservation. (However, in 1971 the courts confirmed that Leech Lake Reservation had never actually been disestablished, but that’s another story)."*

The response had been taken from a long response that probably should have been shortened to include only the very relevant sentences but the longer response put everything into context.)

52.14 Game Management:

In the discussion over deer management on page 183 it states “This is an issue that needs to be raised with the state who has jurisdiction over hunting”. This statement fails to recognize Band jurisdiction over hunting and other resource management. The Band regulates harvest by band members and works cooperatively with the DNR to set harvest levels for state hunters once tribal harvest has been accommodated. We have brought this matter to the CNF attention in the past yet you continue to ignore the authority of the Band to manage resources. Not only is this wrong, but this is very disrespectful.

(Forest Service Reply: The Forest Service does not set hunting quotas or manage them. This is left to other agencies and is outside the scope of our analysis and beyond our day-to-day work. This being the case, the writer, at that time, was unaware of all of the intricacies of game management and whose jurisdiction it is. No disrespect was intended.)

52.15 High Quality Lowland Habitat:

In our correspondence and meeting about this project we requested that the CNF investigate the high-quality lowland habitat near Meadow and Flora Lake. This seems like a potential location for meeting Forest Plan objective O-WL-31 to “Enhance or restore **high-quality habitat** on a minimum of 20, (average 2 sites per year) known sites of sensitive plants.” The KRM EA indicates that this obligation is being fulfilled with a few projects of questionable value to sensitive plant. However, we contend you are not meeting the intent of this Objective, since six years of the Plan has elapsed you should have about 12 sites protected. You are far from this goal and we think you actually need to assess these locations as a means of meeting this objective.

(Forest Service Reply: We do not consider our projects to be of "questionable value." They are intended to accomplish specific objectives.

We appreciate your input on the quality and value of these sites. Since treatments are not planned on the Meadow or Flora Lake lowland habitats for this project, an analysis is not needed or included in our environmental document.

In the past you provided similar input on other projects. One such example is Barott's Bog on the Blackduck district. As a result, an inventory was financed and conducted during FY 2010. The results have not yet been compiled.

Our most recent Monitoring and Evaluation Report for FY 2008 (PR# 239ee), discusses on page 30 sensitive plant restoration projects. They include Botrychium transplanting and monitoring, Canada Yew planting, relocation of showy Laky slipper along the Scenic Highway. Although not a sensitive species, the Chippewa NF has taken a lead in restoring American elm (p. 98-99). On page 100 you will also find a discussion of our Goblin Fern study.

We conduct extensive surveys for TES species in years prior to forming a project proposal. This is a key step that allows us to maintain and protect rare species occurrences. We are also maintaining landscape elements, like large mature/older upland forest patches, that contribute to rare species conservation.

*As a result of surveys in 2009, a total of 182 new RFSS/TES locations were identified. Two orchid species that inhabit lowland conifer stands were noted. There were new White adder's mouth locations reported on the forest. In addition, the rare bog adder's mouth was monitored on the Walker District where it was first located in 2008. This species was also found on the Deer River District. Surveys have also detected new locations for bur-reed which is more abundant than previously thought. Forest staff joined DRM staff in monitoring the lone one-flowered broomrape (*Orobanche uniflora*) location. (See draft Monitoring and Evaluation Report for FY 2009 for more details.)*

In the last couple of years, the Forest has invested a considerable effort in conducting aquatic sensitive species surveys and protecting these species by removing culverts in decommissioned roads, replacing existing culverts with larger ones, and removing dams.)

52.16 Winnie Boat Landing:

This EA discusses expansion of the Winnie Campground access parking, but does not analyze need for expansion if the non-native snail infestation in the lake reduces access use at this location.

(Forest Service Reply: As a different project, the District is analyzing alternatives for the boat launch at Winnie Campground that will mitigate the transportation of the faucet snail. It is anticipated that a launch will remain there and we do not anticipate much if any reduced use. At the present time, it takes very few boat trailers to fill this small parking lot, and this is a very popular landing site; so more parking is needed.)

52.17 Bass Lake Access:

The proposal looks at the problems associated with ATVs the Bass Lake carry in access. This is a small lake that cannot withstand the fishing pressure it is receiving due to increased access. This area is supposed to be a non-motorized area and the CNF should find the means to block ATVs and enforce the closure.

(Forest Service Reply: Two of the alternatives analyzed the effects of closing this user-developed access and one looked at the effects of fixing it so it is a legal, safer, less-damaging access. The Forest Plan and the MN DNR both show the desired condition to be a walk-in fishery and roaded no access.

Based on the results of the effects analysis and comments such as this one, the deciding officer will make a decision.)

52.18 Need Substantial Revisions to Proposals:

As you can see from the comments above, the DRM continues to have serious issues with this proposal, and it fails to address many of the concerns raised by local tribal members from the Buck Lake and Sugar Bush communities. We look forward to substantial revisions and continued dialog about this project if you are to meet your trust responsibility to the band.

(Forest Service Reply: We have looked closely at all of the comments we received and made changes as necessary. These will all be taken into account in the decision.)

We have consulted with the Band and will continue to do such consultation throughout the NEPA process. Thank you for expressing your concerns over this project.)

53. SHPO - Britta Bloomberg - letter - 7/29/2010 (PR# 540)

53.1 Consultation:

Based on available information, we conclude that no properties listed in or eligible for listing in the National Register of Historic Places will be affected by this project.

Please note that the Leech Lake Tribal Historic Preservation Officer has assumed partial Section 106 review responsibilities for projects located within the reservation area as approved by the National Park Service. Since this project is partially located in that area, you should consult with the Tribal Historic Preservation Office as well.

(Forest Service Reply: Duly noted.)

54. THPO - Gina Lemon - letter - 8/23/2010 (PR# 555)

54.1 Consultation:

I have reviewed these undertakings with regard to potential historic properties. After reviewing the supporting documentation for this particular project area, I am in concurrence with your recommendations.

(Forest Service Reply: Duly noted.)

55. THPO - Gina Lemon - letter - 8/23/2010 (PR# 555)

55.1 Her Address:

Since I did not have a physical mailing address for Nancy Beaulieu for sending the Appeal Period documents, I called her this morning. She gave me her address plus some additional comments on our management.

(Forest Service Reply: The address is in the project record.)

55.2 More comments on Traditional Gathering and Access:

She was concerned that loggers take more than they are allowed to cut or that the Forest Service cuts more or larger areas than are shown in the EAs. She mentioned the small stand by Beaulieu Road that was supposed to be a thinning, but looks more like a clearcut to her (and the other residents). This was Compartment 137 Stand 98.

She is concerned that the thinning by Flora Lake will all look like Stand 98 and ruin the stands where they do a lot of hunting.

She stressed that she and many other Band members rely on the forest and lakes for food (hunting and fishing) and for medicinal plants and that they need good access for this. She mentioned a recent clearcut near Big Lake where the loggers blocked their access over a road that the Band uses for access to the lake, rather than the public access.

(Forest Service Reply: Compartment 137 Stand 98 was cut prior to the Cass Lake EA and prior to my arrival on the District. Past records show this as having been a patch clearcut, possibly part of the

Bluestem Salvage Sale or the Bluestem Sale. There is no record that this was ever intended to be a thinning as local residents say.

I assured her that the preferred alternative coming out in the decision notice is to thin only a strip near the highway and to leave ¾ of the stand untouched. The thinning will leave many more trees than are in Stand 98.

The Forest Service did not harvest any timber along the Big Lake Road recently. It is probably an 80 acre piece of Potlatch Timber Land that was clearcut, adjacent to the 40 acres of National Forest System land. There is a road that starts on NFS land but quickly goes onto the Potlatch land to the south, where the logging apparently occurred.)

APPENDIX D - ALTERNATIVE C (modified) SPREADSHEETS AND MAPS (Appended after 06/24/2010)

The table and maps in the KRM EA were modified to become Alternative C (modified). They are included in the Decision Notice/FONSI as Table DN.1, so are not repeated here.

APPENDIX E - PROJECT RECORD INDEX (Appended after 06/24/2010)

Changes to the Kitchi Resource Management EA since 6/24/2010.

Docu #	Date	From	To	Subject	Type	Catgry
492a	2010.06.24	Blackduck	Mail List - Steve	Note to accompany the Public Comment Letter and EA about the CD of shapefiles included	docu	Pub inv
492b	2010.06.24	Blackduck	Mail List - 4 chairmen	Note to accompany the Public Comment Letter and EA about the 4 maps included	docu	Pub inv
492c	2010.06.24	Blackduck	Mail List - Mike and Craig	Note to accompany the Public Comment Letter and EA about the CD also included	docu	Pub inv
497	2010.06.25	Blackduck	LLBO	Certified Letter Receipt sent to Bruce Johnson for Public Comments	letter	Pub inv
499	2010.06.25	Blackduck	S.O. - Andrea	Request for Section 106 Consultation for KRM EA	email	Pub inv
500	2010.06.25	S.O. - Andrea	Blackduck	Will begin Section 106 next week	email	Pub inv
505	2010.06.28	Leonard Headbird	Blackduck	Public Comment Letter Returned - no receptacle	letter	Pub inv
506	2010.06.30	LLBO-Steve	Blackduck	He needs the BE for Kitchi EA. Could we have a meeting in mid July	email	Pub inv
507	2010.07.01	Lyman White SR	Blackduck	Public Comment Letter Returned - no receptacle	letter	Pub inv
509	2010.07.01	Howard T. White Jr.	Blackduck	Public Comment Letter Returned - resent letter to new address	letter	Pub inv

Docu #	Date	From	To	Subject	Type	Catgry
511	2010.07.02	Richard(?) White	Blackduck	Public Comment Letter Returned - resent letter to new address	letter	Pub inv
513	2010.07.03	Bruce Johnson - LLBO	Blackduck	Return Receipt for Public Comment Letter	docu	Pub inv
513a	2010.07.05	LLBO-Levi	Blackduck	Levi had concerns over disclosures in EA	email	Pub inv
514	2010.07.06	S.O.	SHPO - Heidemann	Request for Section 106 Consultation	letter	Pub inv
514a	2010.07.06	S.O.	THPO - Gina	Request for Section 106 Consultation	letter	Pub inv
515	2010.07.06	Arlund Wakefield	Blackduck	Public Comment Letter Returned - unable to forward	letter	Pub inv
517	2010.07.08	Edward Fairbanks	Blackduck	Requested a CD Copy of the Kitchi through Neil Peterson - sent him a copy today	email	Pub inv
518	2010.07.14	MNDNR - Jack Olson	Blackduck	Is the KRM EA on the website?	tele	Pub inv
518a	2010.07.14	S.O.	Blackduck	KRM EA will be put on the website	email	Pub inv
520	2010.07.19	Blackduck	LLBO - Steve	Questions - did you get BE or set up meeting?	email	Pub inv
521	2010.07.19	Blackduck	S.O.	Wording changes proposed due to LLBO comments on disclosures	email	Pub inv
522	2010.07.19	Blackduck	LLBO - Steve	Sent him/Bruce/Levi electronic copy of the two BEs	email	Pub inv
524	2010.07.19	LLBO - Levi	Blackduck	Delivery failure of email to Levi	email	Pub inv
526	2010.07.19	Blackduck	LLBO - Steve	Sent Steve dates we are available for a meeting on KRM EA	email	Pub inv
530	2010.07.21	Mission/Buck Lake LIC	Blackduck	Reply to Public Comment Letter	letter	Pub inv
533	2010.07.21	LLBO - Steve	Blackduck	He will get back with us about a possible meeting on KRM EA	email	Pub inv
538	2010.07.26	LLBO DRM	Blackduck	Reply to Public Comment Letter	letter	Pub inv
540	2010.07.29	SHPO Bloomberg	S.O.	Reply to Section 106 Consultation request	letter	Pub inv
542	2010.08.05	Blackduck	Blackduck	IDT Meeting Notes	docu	anal
543	2010.08.09	Blackduck	LLBO - Levi	Greg and Levi's communications over setting up a meeting from 8/9 to 8/20	docu	refer
544	2010.08.09	Blackduck	Blackduck	Fieldtrip IDT Notes	docu	anal
545	2010.08.13	Blackduck	Blackduck	Field review of 1-128-14	docu	refer
547	2010.08.16	S.O.	Blackduck	Who can appeal this EA?	email	refer
549	2010.08.17	S.O.	S.O.	Section 106 Consultation request reply from Gina is delayed	email	Pub inv
550	2010.08.17	LLBO - Gina, Steve	Blackduck	Comments on NEPA projects	docu	Pub inv
551	2010.08.19	Deer River	Blackduck	Email about Results of new TES surveys for selected KRM EA stands	email	refer
551a	2010.08.19	Deer River	Blackduck	Results of new TES surveys for selected KRM EA stands (actual stands)	email	refer

Docu #	Date	From	To	Subject	Type	Catgry
551b	2010.08.19	Deer River	Blackduck	Results of new TES surveys for selected KRM EA stands (actual stands plus affected stands plus prescriptions)	email	refer
555	2010.08.23	THPO - Gina	Blackduck	Reply to Section 106 Consultation request	letter	Pub inv
560	2010.08.24	Blackduck	Blackduck	Alt. C (modified) Harvest and Regeneration Map	map	refer
561	2010.08.24	Blackduck	Blackduck	Alt. C (modified) Harvest and Regeneration Map	map	refer
562	2010.08.24	Blackduck	Blackduck	Alt. C (modified) Harvest and Regeneration Map	map	refer
563	2010.08.24	Blackduck	Blackduck	Alt. C (modified) Harvest and Regeneration Map	map	refer
564	2010.08.24	Blackduck	Blackduck	Alt. C (modified) Harvest and Regeneration Map	map	refer
570	2010.08.25	LLBO, Levi	Blackduck	Meeting Notes discussing Public Comment Letter	docu	Pub inv
575	2010.08.27	Nancy Beaulieu - Sugarbush LIC	Blackduck	Her mailing address and more comments on traditional gathering	tele	Pub inv
577	2010.08.30	Blackduck	The American	Legal Notice for KRM EA Decision Notice/FONSI sent electronically	email	Pub inv
578	2010.08.30	Blackduck	The American	Legal Notice for Kitchi EA (hand carried to The American)	docu	Pub inv
579	2010.08.30	Blackduck	The American	Legal Notice for Star Island Toilet (hand carried to The American)	docu	Pub inv
579a	2010.08.30	Blackduck	The American	Legal Notice for Star Island Toilet Decision Notice/FONSI sent electronically	email	Pub inv
580	2010.08.30	Blackduck	Mail list	Letter announcing Star Island Toilet Decision Notice/FONSI signing (signed)	email	Pub inv
581	2010.08.30	Blackduck	Blackduck	Mail List for Letter announcing Star Island Toilet Decision Notice/FONSI signing	email	Pub inv
582	2010.08.30	Blackduck	Mail list	Letter announcing Star Island Toilet Decision Notice/FONSI signing (electronic signature)	email	Pub inv
583	2010.08.30	Blackduck	Blackduck	DN/FONSI for Star Island Toilet	docu	analysis
584	2010.08.31	Blackduck	Blackduck	DN/FONSI for KRM EA	docu	analysis
584a	2010.09.02	Blackduck	Blackduck	"Changes EA"	docu	analysis
585	2010.09.02	Blackduck	Mail list	Letter giving appeal rights for Kitchi EA DN FONSI (signed)	letter	Pub inv
588	2010.09.02	Blackduck	Blackduck	Mail list for Letter giving appeal rights for Kitchi EA DN FONSI	table	Pub inv
589	2010.09.02	Blackduck	Blackduck	Mail Labels for Letter giving appeal rights for Kitchi EA DN FONSI	table	Pub inv
590	2010.09.02	Blackduck	Blackduck	Letter giving appeal rights for Kitchi EA DN FONSI (electronic signature)	table	Pub inv
591	2010.09.02	Blackduck	Nancy Beaulieu	Note with Letter giving appeal rights for Kitchi EA DN FONSI	letter	Pub inv
592	2010.09.02	Blackduck	Sugarbush LIC	Note with PR# 595 Letter giving notice of signing of Kitchi EA DN FONSI	table	Pub inv
595	2010.09.02	Blackduck	Blackduck	Letter giving notice of signing of Kitchi EA DN FONSI (signed)	table	Pub inv
598	2010.09.02	Blackduck	Blackduck	Mail list for Letter giving notice of signing of Kitchi EA DN FONSI	table	Pub inv
600	2010.09.02	Blackduck	Blackduck	Letter giving notice of signing of Kitchi EA DN FONSI	table	Pub inv

Docu #	Date	From	To	Subject	Type	Catgry
				(electronic signature)		
601	2010.09.02	Blackduck	LLBO - Bruce Johnson	Certified Return Receipt on Letter giving appeal rights for Kitchi EA DN FONSI	docu	Pub inv

APPENDIX F: GLOSSARY (appended in Changes EA)

Acronyms

CNF - Chippewa National Forest

DRM - Division of Resource Management

EIS - Environmental Impact Statement

FEIS - Final Environmental Impact Statement

FP - Forest Plan

LIC - Local Indian Council

NF - National Forest

RFSS - Regional Forester Sensitive Species

TES - Threatened, Endangered, or Sensitive Species