

# **Appendix D**

## **30-Day Response to Comments**



Comment Number	Name and Address	Comment	Response
1-1	Darrel Palmer 22752 Serenity Lane Nisswa, Mn 56468	I am concerned about the changes in regulations that may affect our ability to use the forests around our property in the fashion we have enjoyed for decades. It seems like the trend is away from allowing motorized vehicle use in these areas and I am opposed to this trend.... The Roadless Initiative makes no sense to me.	<p>For clarification, Moon EA Chippewa National Forest proposed road management objectives are not a process of a "Roadless Initiative".</p> <p>Proposed changes to road management objectives (i.e. where motorized uses are allowed/prohibited on National Forest Systems Road) within the Moon EA project area follows direction provided by the US Forest Service's Travel Management Access Rule (2005), the Chippewa National Forest Land Management Plan (2004) and the Chippewa National Forest Off-Highway Vehicle Road Travel Access Project (2007).</p> <p>Please see these records of the analysis in order to understand the process and reasoning for determining current Forest road management objectives. The 2007 OHV decision is available on the CNF website and Travel Management information is available from the USFS national website. <a href="http://fsweb.chippewa.r9.fs.fed.us/">http://fsweb.chippewa.r9.fs.fed.us/</a></p>
1-2	Darrel Palmer 22752 Serenity Lane Nisswa, Mn 56468	ATV riders have gotten organized and have taken on the task of educating and informing riders of the do's and don'ts of riding ATV's and this process is making a difference BUT if you take away the trails/roads that these riders use they will try to find other areas to ride and that will cause more problems. As opposed to closing trails the Chippewa National Forest should be looking for areas that ATV riders can ride in that provide scenic riding areas so people will want to ride their ATV's and increase the use of our forests and help Minnesota's economy.	The Moon EA analysis recommends in three separate alternatives which Forest Service roads are determined to allow or prohibit all motorized vehicles, including highway licensed vehicles (HLVs), as well as Off-Highway Vehicles (OHVs). The analysis did consider in Alternatives B and C, OHV riding opportunities, with acknowledgment to Minnesota Department of Natural Resources information on the opportunities OHV riders provide to local and regional economies.
1-3	Darrel Palmer 22752 Serenity Lane Nisswa, Mn 56468	In looking at the area north of Remer it appears that any time a multi use trail (forest road) crosses the North Country Hiking Trail it has been proposed to be closed. Why?? The NCHT has to cross numerous road and highways and yet we don't propose to close them. If we need posts at trail intersections to keep ATV's off of these trails then lets get posts installed versus having to close off other users recreational uses in this area. See my comments in the General Section regarding	For background, the North Country National Scenic Trail (NCNST) was given special consideration when the Chippewa National Forest Off-Highway Vehicle Road Travel Access Project (2007) Decision Notice was published. Specifically, on Decision Notice page 7, then Forest Supervisor Robert Harper decided that, "[A]dditional roads are closed based on their proximity to the Suomi and Trout Lake Semi-Primitive Non-motorized Areas, the North Country National Scenic Trail (NCNST) and some designated hunter-walking trail systems."

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		<p>economic benefits. I cannot recall the trail on FR2793 or FR2321B but it look to me like their only fault is they cross the NCHT. Please leave them open.</p>	<p>Further, in the Decision Notice, Section IV Rational for Decision, Protection of the Recreation Experiences Associated with Non-Motorized Trails and Semi-Primitive Areas, page 13, it is stated, <i>“The North Country Trail (NCT), a national recreation hiking trail corridor is also heavily used by ORVs in certain areas. I have limited the designation of existing roads open to ORV use adjacent to the NCT and Suomi and Trout Lake semi-primitive non-motorized areas to reduce opportunities that may lead to illegal ORV use within these areas.”</i></p> <p>As stated above, and as analyzed in the Moon EA, the North Country National Scenic Trail (NCNST)—and the illegal use of OHVs on the Trail—were criterion in determining whether to allow motorized access adjacent to it (EA, Table 2-7, Secondary Indicator, pg 28; pg 83; Table 3-33, pg 87; Table 3-34, pg 88).</p> <p>However, the Forest Plan (pg 2-47), 2007 OHV decision (pg 8), and analysis in the Moon EA recognize access needs to some forest and non-Forest lands and the need to interface with county roads (Forest Plan, pg 2-47 and EA pgs 88, 90). Mitigation TV2 provides under Alternative B or C that “No forest system road will be opened to all motorized vehicle use until appropriate mitigations are in place to protect designated nonmotorized trails from all motorized use. Mitigation applies to all stands crossing, intersecting, or within 1/4 mile of the North Country Trail.”</p> <p>FR2793 (.73 mi) and FR2321B (.74 mi) are currently open to HLVs and closed to OHVs (EA, pg 88). This management is inconsistent and a result of the 2007 OHV decision. Closing or opening these segments to all motorized use would decrease confusion and increase road management consistency (EA, Key Issue #2, pg 11).</p>
1-4	<p>Darrel Palmer 22752 Serenity Lane Nisswa, Mn 56468</p>	<p>In reviewing the map labeled “Moon RMP Proposed Changes to Motorized Use of System Roads – ALTC “ I see that you have proposed keeping FR 2792 open per our previous conversations. I support that change. This is an extensive trail network and those trails are all on higher ground. I was there this spring and I could not see any damage that had occurred as a result of ATV traffic.</p>	<p>The Forest Service acknowledges that some deer hunters using the road and area would indeed be opposed to the idea of closing FR2792 to motorized use. The Forest Service also hears from deer hunters - by annual deer camp visits - that may prefer less motorized use in some deer hunting areas, as well.</p> <p>Some users of the area and Chippewa National Forest lands that don't deer hunt, do prefer nonmotorized roads and trails to</p>

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		I hunt grouse regularly on this trail and if it is closed it will become overgrown in a short period of time and will be more difficult to hunt. I know that there are numerous deer hunters back in this area as well. I would expect that if you were to have someone sit at this trail head during deer season and ask those deer hunters their view of closing this trail system that they would be very upset and opposed to the concept. Truck traffic regularly drives to virtually the end of the trails.	<p>motorized use, and have expressed such opinions during the time that led up to the Chippewa National Forest Off-Highway Vehicle Road Travel Access Project (2007) decision.</p> <p>Such opinions were expressed during Moon project scoping (January 2010) and may be found in EA, Appendix C, letters 1, 6, 10, 33, 42, 43. These are on the CNF website.</p>
1-5	Darrel Palmer 22752 Serenity Lane Nisswa, Mn 56468	In reviewing the map labeled “Moon RMP Proposed Changes to Motorized Use of System Roads – ALTC “ I see that you have proposed keeping FR 2103C open per our previous conversations. I support that change. (in the Trails for Obliteration this is proposed to be obliterated – I am opposed to that change!)	<p>We understand your concern with obliterating FR2103C. Mitigations (Appendix B, pgs 13 &amp; 14) provide for bringing forest system roads up to designated standards or repairing/ reconstructing to the maintenance level necessary to support vehicular use and protect soils and water quality.and have addressed it by offering a range of alternatives and mitigations.</p> <p>Field review of 2103C found that some surfacing and maintenance would be necessary to support large vehicles or spot gravel if just ATVs are allowed. The more severe impacts are located in wet spots (primarily adjacent to wetlands).</p> <p>The existing condition under Alternative A is open to HLVs only (EA, pg 88).</p>
1-6	Darrel Palmer 22752 Serenity Lane Nisswa, Mn 56468	In reviewing the map labeled “Moon RMP Proposed Changes to Motorized Use of System Roads – ALTC “ it appears that you have closed the “Lost Girl Trail” to all motorized traffic except snowmobiles yet on “Moon RMP Proposed Changes to Motorized Use of System Roads – ALTB” you have that trail section open to ALL motorized traffic. This is an extremely nice trail and is very wide in most spots going through some spectacular maple ridges. It is a great snowmobile ride in the winter but is even more scenic in the fall when the leaves are changing. Please leave FR 2069, FR2071 and FR2559 open to motorized traffic year round so we can enjoy the scenery and hunting available in this area. FR2076 is handled the same way in the two exhibits. I have ridden	<p>We have noted the concerns expressed about closing roads 2069, 2071, and 2076. The proposed alternatives (B&amp;C) provide a range of opportunities for recreation resources and the mitigation provides for protection of aquatic, soil, and wildlife resources.</p> <p>The Moon EA addresses travel management inconsistency and the confusion it has caused by analyzing Forest System Roads (FSR) currently open to HLVs only (passenger cars, trucks, SUVs) and closed to OHV use. Travel management remains an ongoing process on the Walker Ranger District. The District recognizes that all MVUM inaccuracies or FSR use changes cannot be identified or implemented at one time in one project. (EA, Key Issue # 2, pg 83, Management Direction, pg 85)</p> <p>However, some forest roads are currently open to highway</p>

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		<p>snowmobiles on this trail but never ATV's. Please consider having it stay open so that it can be interconnected longer term to the Moose River ATV Trail north of Outing.</p>	<p>licensed vehicles (HLVs) only (Alternative A). This inconsistency resulted from the 2007 OHV DN which only looked at HLVs. In this EA, Alternatives B &amp; C take the same approach to implementing the 2007 OHV decision—open or close to all motorized summer use. (EA, pg 89). Mitigations (Appendix B) provide for bringing forest system roads up to designated standards or repairing/reconstructing to the maintenance level necessary to support vehicular use and protect soils and water quality.</p> <p>Under Alternative C, Forest roads 2071, 2069, 2069A, 2076, and a 0.38 mile section of road currently open to HLVs would close to all motorized use except for snowmobiles under frozen ground, snow conditions (Table 3-35). The effects of closing these roads to all motorized use would create longer connecting snowmobile trail routes on forest roads, afford opportunities for nonmotorized, dispersed recreation in summer months, and reduce long term maintenance costs. Under Alternative C, these forest roads would open seasonally to snowmobiles and remain closed to other recreational motorized vehicle uses the remainder of the year. (EA, pgs 88-89).</p> <p>Under Alternative B, Forest roads 2069 (1.98 mi), 2069 (.72 mi), and 2071 would open to all motorized vehicles. Opening these roads to year-round motorized use would require repairs or possible culvert replacement, and potentially some road reconstruction. (EA, pg 89)</p> <p>The middle section of FR2559 is obsolete due to reroute of the Lost Girl snowmobile trail (Rice Lake Decision 2002) (EA, pg 88).</p> <p>To clarify Appendix B, the Lost Girl Snowmobile Trail now extends south on FR2103 from the intersection of FR2259 and FR2103. FR2559 is currently closed to ATVs under the Forestwide 2007 OHV decision. That decision did not address Highway Licenced Vehicle (HLV) use of the road. Field review on September 10, 2010, showed deep rutting and soil compaction occur along segments of the route, due to sensitive soils and wetlands. This section of the road is proposed to be closed to protect soil and water resources as well as bring consistency to motorized use of</p>

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			<p>the route.</p> <p>At this time, field review and the Moon analysis indicates that the existing roads of the designated State of MN, Grant-In-Aid, Lost Girl Snowmobile Trail do serve better as a snowmobile trail (GIA snowmobile use occurs over frozen ground during December 1 to March 1) than as an access route for all other motorized uses (highway licensed vehicles and OHVs) due to wetland and soil resource issues.</p> <p>The Forest Service would continue established partnerships with the State of Minnesota, Cass County (MN) Lands Department, the Eagle Country Snowmobile Club (Remer, MN), the Longville Lakes Area Snowmobile Club (Longville, MN), and the Leech Lake Riders Snowmobile Club (Walker, MN) to manage and maintain Walker District-wide snowmobile trail systems. Future opportunities would exist during the next planning cycle (5 years and beyond) to consider OHV trail systems provided an established OHV Club partners with the State of Minnesota, Cass County and Forest Service under the State of MN Grant-In-Aid program.</p>
1-7	Darrel Palmer 22752 Serenity Lane Nisswa, Mn 56468	In reviewing the map labeled “Moon RMP Proposed Changes to Motorized Use of System Roads – ALTC” FR 2323B is proposed to be closed to motorized traffic. The corner of Hwy 65 and FR2323 and FR2785 has numerous deer hunters who park and camp there. They deer hunt back on all segments of FR2323 and FR2785 and if they knew about this proposed trail closure would be upset. Is it possible to survey some of the hunters in these areas in the fall when hunters are there and using the trails to get their input??? This area also makes a nice family ATV ride for us. I can leave my cabin and ride the ditches west on 65 to FR2325. I follow FR2325 south and then back west to FR2323 (yes they are connected even though the map doesn't show it – the beavers are trying to flood out the trail but there is a bridge). Once on FR2323 you can ride cross 65 and then ride FR 2728 - there used to be a trail that even connected on to FR2776 but it is	<p>The Walker Ranger District staff is aware that many road segments provide access for deer hunters (and many other Forest users) to favorite user dispersed camping sites on National Forest public lands. It is not possible to survey the “numerous deer hunters who park and camp” at the described location. From many previous experiences visiting “deer camps”, the Walker Ranger District recreation staff and Forest Law Enforcement Officer acknowledges that opinions would be varied on motorized access issues, and is done when resources are available and the timing of visitors in “camp” is apparent.</p> <p>This route may involve cross country travel where no formal inventoried and designated road or trail exists. As a reminder, by Forest Service order and the Forest Plan, page 2-43, “[c]ross country OHV and snowmobile travel is prohibited”.</p>

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		getting overgrown- and we could then ride down Cty rd 135 and ride some of the trails off of it.	
1-8	Darrel Palmer 22752 Serenity Lane Nisswa, Mn 56468	<p>In reviewing the map labeled “Moon RMP Proposed System Road Obliteration for Alternatives B &amp; C “ I see that you have proposed obliterating FR 2117[C]. Why would you want to obliterate this trail?? FR 2117 is on relatively high ground for this area. There is a small parking lot at the trail head (one of few where you can pull in with a trailer or possibly a camper (I have seen that on several occasions). I regularly hunt grouse there with my sons and have bow hunted there occasionally also. There are a number of other deer hunters back in this area too. This trail crosses the North Country trail and continues north past the beaver pond (east side of the trail) and if you continue to follow the old trails you come back out to the end of FR2703 on the north side. It makes a nice walk and also could be developed into a trail loop with other trails off of this loop system. Why we would spend tax dollars to ruin a good walking and ATV trail makes no sense to me as a tax payer.</p> <p>2117C - there is a small parking area near the end of this road (about 3 cars) and this road is actively used in deer season. It is high ground and dry, so there does not appear to be a reason to obliterate it unless the reason is the proximity to the North Country Trail. If the reason is the NCT, did we consider barricading the NCT instead of obliterating the road? Do not obliterate this section of road. [voice mail message]</p>	<p>The proposed alternatives (B&amp;C) are intended to provide a broad decision range which may afford recreation opportunities while meeting Forest Plan objectives to protect aquatic, soil, and wildlife resources.</p> <p>FR2117C (1.2 mi) was proposed for obliteration because (1) in the vicinity of the North Country National Scenic Trail—see response 1-3, (2) garbage dumping, (3) the gate was removed, and (4) reduces road density. The intent of obliteration is to make the corridor unusable as a road or trail (Forest Plan Glossary, pg G-18).</p> <p>FR2703 was dropped from analysis due to uncertainty about jurisdiction; the road provides access to State lands. The road is open to HLVs.</p>
1-9	Darrel Palmer 22752 Serenity Lane Nisswa, Mn 56468	In reviewing the map labeled “Moon RMP Proposed System Road Obliteration for Alternatives B & C “ I see that a section of FR 2559 is proposed to be obliterated. Isn't this part of the snowmobile trail as well??	<p>The map shows a westerly section of FR2559 crossing private land, a middle section from the private land to intersection with FR2587, and an easterly section from FR2587 to intersection with FR2103.</p> <p>The middle section is obsolete due to reroute of the Lost Girl snowmobile trail under the 2002 Rice Lake Decision. (EA, Table 3-35, pg 88). Obliteration of this section of the trail would not</p>

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1-10	Darrel Palmer 22752 Serenity Lane Nisswa, Mn 56468	We have plenty of gated Hunter Walking Trails including the Johnson Lake Ruffed Grouse area in this area for those hunters that don't want to be disturbed by ATV's. I walk a lot of miles behind my labs and I appreciate having the ATVer's knock down the grass and undergrowth on these forest roads. I do not want to see more trail closures. Please leave the trails open.	<p>affect the snowmobile route.</p> <p>The Chippewa National Forest has eleven (11) designated Hunter Walking trails (see <a href="http://www.fs.fed.us/r9/forests/chippewa">www.fs.fed.us/r9/forests/chippewa</a>) These are managed as nonmotorized trails for the hunting, gathering, and sight-seeing public, and are maintained to Forest Service standards, including mowing and brushing of the trail systems when resources are available.</p>
1-11	Darrel Palmer 22752 Serenity Lane Nisswa, Mn 56468	From the obliteration map: please consider keeping open the segment of road that is identified to be obliterated that runs from the Lower Milton Road to road 2113 (FSR 2323B). Keep this open as it is currently being used as part of a loop and closing that section will take a portion of the loop away.	<p>To clarify: FR2323B is not in the obliteration proposal. FR2323B (.60 mi) is proposed for closure under both Alternatives (B&amp;C). FR2113 does not intersect with FR2323B. To join, the routes would have to cross a flowage and private land.</p> <p>The road that runs from the Lower Milton Road to FR2113 has been a concern to District and Forest managers before the Moon EA analysis began and has never been recognized as a Forest Service inventoried road (see Motor Vehicle Use Map, South, 2009). This road has been identified to be obliterated prior to Moon EA analysis. FY10 funds to obliterate were moved to FY11.</p> <p>Referring to the section of FR2324 extending from the boat launch on Lower Milton Lake northeast to FR2113F then, this section of FR2324 is proposed for obliteration because (1) the route is not on the 2009 MVUM map and is not open to motorized use, (2) the route bisects a wetland area at the end of the lake and has torn up the area; other segments show rutting, soil compaction, and erosion, especially along portions of the eastern lakeshore of Lower Milton lake, and (3) the route was barricaded at the boat launch to prevent motorized use; however, the gate has been breached and the barricade is ineffective due to illegal cross-country travel around the structure (see FY2008 M&amp;E 2009, pg 43).</p> <p>FR2113F and FR2324 intersect further east on the Deer River Ranger District. About one-half mile was designated open to OHVs and HLVs by OHV decision.</p>
2-1	David Halsey, President Woodtick	We encourage you to consider keeping as many roads open to OHVs as possible in this area for future use in a Grant-In-Aid ATV Travel Route that	The Walker Ranger District acknowledges that opportunities for future trails exist not only during the planning period of the Moon EA, but beyond 5 years, as well.

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	Wheelers ATV/OHM Club 14848 64th Place N. Maple Grove, MN 55311-4116	would connect Longville to Remer. An ATV Travel Route that reaches from the Foot Hills State Forest to Longville and Remer would be a very positive step for the Chippewa National Forest, providing an outstanding riding opportunity for families who enjoy riding ATVs, a major social and economic boost to the area, and a positive image for the National Forest that shows a new level of cooperation with the Minnesota DNR, Cass County, local cities and townships, and local ATV and snowmobile clubs.	
2-2	David Halsey, President Woodtick Wheelers ATV/OHM Club 14848 64th Place N. Maple Grove, MN 55311-4116	For Travel Management designations on forest roads in the FR2792 System, we encourage you to choose Alternative C, to provide access and continued use by OHVs in this area for riding, hunting and other family-related outdoor activities. Specifically: FR2792 - we recommend Alternative C. FR2792A, B, C, D, E, F - we recommend Alternative C.	<p>Thank you. As stated in the 30-Day Comment Cover Letter (July 7, 2010), the District Ranger is considering Alternative C or modifications to Alternative C for the transportation system; and she intends to review all comments and concerns about current road conditions and future road uses. This is an ongoing process as stated in the EA, Management Direction, pg 85.</p> <p>Changes in road designations to fix and reopen would be dependent upon Forest budget/staff limitations and capacity of potential partners (such as local OHV or snowmobile clubs, Resource Advisory Committees, or other Township or municipal government entities) to accomplish needed work to reopen and monitor a road. (EA, pg 84)</p> <p>Field review of FR2792 and its spurs shows that the mainstem is a crowned and ditched road in generally good condition with slight to moderate rutting and ponding at the turn north on FR2792 east of 1st NCT crossing (1st NCT crossing is currently barricaded) and the remaining portion of FR2792 and spurs A, C, D, and E are all native surface roads with little to no maintenance currently; few impacts; and minor signs of ATV use. These segments were closed to ATVs in the 2007 OHV decision (pg 7) due to proximity to the NCT (also see response 1-3 and EA, pgs 87, 89, 90 ).</p>
2-3	David Halsey, President Woodtick Wheelers ATV/OHM Club 14848 64th Place N.	For Travel Management designations on forest roads south of Remer, we encourage you to choose the Alternatives as shown, to provide access and continued use by OHVs in this area. Specifically: FR2069B - we recommend Alternative C. FR2559 -- we recommend Alternative C. FR2103C -- we recommend Alternative C.	see responses 1-5, 1-6, 1-9

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	Maple Grove, MN 55311-4116	FR2063 -- we recommend Alternative C. For the Eagle Country Snowmobile Trail: For all Forest Roads listed -- we recommend Alternative B. For Lost Girl Snowmobile Trail: For all Forest Roads listed -- we recommend Alternative B.	
2-4	David Halsey, President Woodtick Wheelers ATV/OHM Club 14848 64th Place N. Maple Grove, MN 55311-4116	We thank the Chippewa National Forest for considering our recommendations. On a local, state and national level, there are initiatives to promote greater use of public land by young people and families, to encourage a healthier lifestyle and reconnect with our country's public land. The US Forest Service is in the process of creating a new Forest Plan in this direction as well. Key to access by the public is ensuring that there are roads managed as responsible and sustainable routes for traveling with HLVs, ATVs and OHMs.	Your support is appreciated. Note: this is a site specific project on the CNF, not a Forest Plan. We look forward to continuing collaboration with ATV/OHM clubs and local snowmobile clubs.  Changes in road designations to fix and reopen are dependent upon Forest budget/staff limitations and capacity of potential partners (such as local OHV or snowmobile clubs, Resource Advisory Committees, or other Township or municipal government entities) to accomplish needed work to reopen and monitor a road. (EA, pg 84)  The Walker Ranger District thanks this special interest group for helping Forest managers in providing opportunities for ATV and OHM users, to educate and inform motorized use enthusiasts, and for a new level of cooperation with other government entities and user groups.
2-5	David Halsey, President Woodtick Wheelers ATV/OHM Club 14848 64th Place N. Maple Grove, MN 55311-4116	We encourage the National Forest to not close roads strictly on the basis of lack of funding for maintenance. There are three ATV and snowmobile clubs in this area that can work on a cooperative agreement to help maintain roads, create a responsible and sustainable Travel Route, and partner with the Chippewa National Forest on funding through the Minnesota DNR Grant-In-Aid program.	The Forest Service does not base management decisions "strictly on the basis of lack of funding for maintenance." Management direction (EA, pg 85) is from the 2004 Forest Plan and the 2007 Off-Highway Vehicle Road Travel Access decision (2007 OHV Decision). Forest Plan desired conditions include clearly defining and providing road and trail riding opportunities while protecting natural resources (D-RMV-1, 2, pg. 2-42 and D-TS-1, 2, 3, 4, pg. 2-47). Forest Plan objectives and standards include the expectation that Forest roads will be identified as appropriate or inappropriate for OHV use (O-RMV-1, 2; G-RMV-4; S-RMV-1, 2, 4, pg 2-42; O-TS 1, 3, 6, 7, 8, pg. 2-48). We recognize that decisions may not be acceptable to some users.
2-6	David Halsey, President Woodtick Wheelers ATV/OHM Club	We encourage the National Forest to not close or obliterate roads strictly because they are close to the North Country Trail, as the local ATV clubs are willing to cooperate with the CNF and NCT to work to keep renegade riders from accessing the NCT,	See response 1-3.

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	14848 64th Place N. Maple Grove, MN 55311-4116	and educate the community and visiting motorized recreationists on the importance of staying off the NCT and respecting the rights of all outdoor enthusiasts.	
2-7	David Halsey, President Woodtick Wheelers ATV/OHM Club 14848 64th Place N. Maple Grove, MN 55311-4116	We thank the Chippewa National Forest for its continued cooperation with our club, and encourage it to work closely with local ATV and snowmobile clubs to make additional progress to meet the needs of off-road riding opportunities in the area.	The Walker Ranger District looks forward to working with and cooperating with the Woodtick Wheelers in providing ATV and OHVs users opportunities on the Chippewa National Forest.
3-1	John A. Dickerman 313 Viking Dr. Mankato, MN. 56001-4103	As a Longville Lakes Snowmobile Club member I would favor Alternate C. In regards to trail 2071 I know John Roscoe has talked to you about trying to bypass the gravel pit because of the conditions for grooming. I believe it would be better for all parties involved if this change could take place.	The Forest Service will collaborate with the Longville Lakes Snowmobile Club to implement a solution as funding/staff permit. This kind of work is dependent upon Forest budget/staff limitations and capacity of potential partners (such as local snowmobile clubs' Grant In Aid funding) or other Township or municipal government entities to accomplish. (30-Day Comment letter, July 7, 2010)
3-2	John A. Dickerman 313 Viking Dr. Mankato, MN. 56001-4103	As a member of the Woodtick Wheelers I would like to comment on trails 2071 and 2069. If the Grant In Aid trail from Hackensack to Longville materializes closing these two trails would hinder any future development of a Grant In Aid trail from Longville to Remer. I know that closing more good usable trails in the Remer area has a lot of long time locale trail users upset. I can only hope that through these meetings and comment periods we can come to a solution agreeable to the majority of all involved.	See response 1-6, 3-1, 2-7.
3-3	John A. Dickerman 313 Viking Dr. Mankato, MN. 56001-4103	I have a place ... on Big Boy Lake. I have owned this property for 33 years. I have been a snowmobiler in the Chip since 1971 and have used an ATV since 1998. I and many locals have used the Chip for many things in a responsible manner. Please try not to alter this responsible use any more than absolutely necessary, not only for us but for our grandchildren as well.	Your calls and comments about ATV access in your area are welcomed and taken very seriously. Public land managers strive to adapt to issues related to general public use as new ways to access public lands evolve. Use of ATVs and OHVs have increased dramatically -as have the associated issues of ATV's traversing public lands - - for a relatively short period of time when compared to the overall history of the Chippewa National Forest. We can only speculate what may or may not be opportunities for our grandchildren, as well.

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4-1	Tom Chambers 6241 Stae Hwy 200 NE Remer, MN 56672	<p>The District Ranger stated that she is considering Alternative C in the area south of Remer. That would mean closing many of the frequently used trails to all vehicles except snowmobiles. I can't see where that would be an acceptable option. My concern is in the area of roads 2069, 2069A, 2069B, 2071, 2076, &amp; 2066. These are what I would consider major trails for weekenders and vacationers that get used all year by hikers, campers, OHV riders, and snowmobilers, not to mention the local hunters and sportspeople.</p> <p>I know the local snowmobile club spent a lot of time and money maintaining the trails, and it is appreciated, But the trails should be kept open for everyone to enjoy throughout the year. You mentioned the expense of maintenance and grooming trails as one of the factors in your decision, and with everybody trying to work with a tighter budget, it's an issue that needs to be addressed. But the trails that I use do not necessarily need any major improvements that can't be done without some local volunteer support. (namely, people like me) But then, the Forest Service probably has engineers that have a different outlook as to what is necessary road maintenance. It's understandable that you have to factor in a lot of environmental issues that most of us are not aware of.</p> <p>But still, I think the current status of keeping the roads open for All motorized vehicles, with seasonal closures in the spring until the frost leaves, was a more practical solution than what you are proposing now.</p> <p>Having a seasonal residence near the trail, I witness throughout the year a number of people using the trails for hiking, ATV, snowmobile, horseback riding, and vehicles camping along the</p>	<p>See response 1-6, 2-7.</p> <p>If the decision is made to have ATV access, mitigations <u>must</u> be met and partners will be needed.</p> <p>We appreciate your offer to volunteer. Please contact the Public Service staff when your volunteer resources are organized and able to collaborate. Due to safety issues, it is imperative to meet with District personnel prior to operations to ensure the mission would be conducted safely and efficiently.</p>

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		<p>road. The majority of the people I see are responsible users, and respect the trails. I occasionally use the trails and maintain them when the opportunity arises. (Although this year it's been difficult because it rained every weekend I was there) I would hate to see you close these roads to those that use it. Not only would it close off the land for public use, but would also prove to be an economic loss to the local communities.</p> <p>I would consider Combining Alternatives B &amp; C, keeping the major trails open for all to use (2069, 2069A, 2071, 2076, 2066, 2069B) with the exception of seasonal closures. I thought that plan worked well in previous years and don't see any need to change it.</p> <p>This spring I electronically submitted a form to volunteer to help maintain the trails, but never received a response. I don't know if it got lost somewhere or they didn't receive it, but nevertheless I still continue to fill holes and keep the trails cleared. I can do more when the bugs diminish this fall. Please take the time to re-consider the options before you make any final decisions.</p>	
5-1	John Roscoe 5077 Ingua Trail NE Remer MN 56672	<p>I also agree [Alternative] C is a good selection except for trail <u>2017</u> [2071] which should be open for motorized traffic as shown in Alternative B.</p> <p>I am in charge of maintance and grooming for the Longville Snowmobile club. One section of our trail system (Lost Girl Trail) trail 2071 has been maintained by our club for many years.</p> <p>We have always had a problem on this trail with the gravel pit not freezing early in the snowmobile season, thus not allowing our groomer to cross. We need a bypass around this pit. With a bypass we can groom early in the season to get good compaction of the snow. This makes a solid base</p>	<p>See response 1-6</p> <p>The Forest Service annually works with the Longville Snowmobile Club on the State of MN/Grant-In-Aid Lost Girl Trail and has done so prior to Mr. Roscoe being named the Club's snowmobile maintenance and grooming. Last year, a member of the Walker Ranger District Public Service Staff field reviewed and approved numerous minor maintenance issues with the previous coordinator, and WRD staff have done so prior to last year through the Cass County GIA snowmobile trail corridor.</p> <p>The Walker staff would continue to work with the Longville Snowmobile Club, specifically on the issue of traversing a wetland that traditionally doesn't freeze over at the early and late stages of the designated State of Minnesota Grant-In-Aid snowmobile</p>

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		<p>so that the snowmobiles will not damage the ground.</p> <p>By opening this trail to motorized traffic (ATV only) we would have a trail connecting Longville to Remer and to Outing. This small section is critical for connecting the trails. This would be a huge financial gain for the cities of Remer, Longville and Outing.</p> <p>Our Longville Snowmobile club is doing all the maintance of this trail at NO expense to the Forest Service. The two ATV clubs in the area are very interested in this trail and would be willing to help.</p> <p>I am a Trail Ambassador for the DNR and also belong to the Woodtick Wheelers. If we can get the trails open and get Grant in Aid from the DNR, we could have Trail Ambassadors monitoring the trails.</p>	<p>season. The reroute is important but it is not part of the Moon EA.</p> <p>We acknowledge the Longville Snowmobile Club used Club funds and State of Minnesota Snowmobile Grant-In-Aid funds to promote and maintain snowmobile trail opportunities on the Chippewa National Forest for the general snowmobiling public, as Forest funds generally are not appropriated to cover all of the Forest's motorized and non-motorized trail maintenance needs.</p>
6-1	Thomas and Kathryn Maus 254 Hwy 33 North Cloquet, MN 55720	<p>I do not see the need for closing forest roads or destroying the Forest roads in the Chippewa National Forest.</p> <p>The trails need to stay open to ATV riding so that hunters can walk down them without picking up hundreds of deer ticks. I have had to restrict my grouse hunting to walking trails that are used by ATVs rather than the gated trails to avoid all the deer ticks. If you close/gate more trails to walking only, deer ticks will be the only creatures enjoying the trails. The last time I checked, deer ticks don't pay taxes. Please don't close any more trails to walk in only as you eliminate relational [sic] opportunities and provide more cover for the ticks. Destroying existing roads and trails does not make any economic sense as they will have to be rebuilt when it is time to log the area again. As you well know, a road that is not open to vehicle use will be reclaimed by the forest in 10 to 15 years on its own</p>	<p>see letter 1 responses</p> <p>The CNF provides a range of motorized and nonmotorized recreation opportunities. We have also received comments from nonmotorized forest users who are seeking a quiet experience.</p> <p>All roads proposed for decommissioning have gone through an interdisciplinary review process that takes into consideration resource damage occurring and future need for road management.</p>

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		without taking equipment and tax resources to destroy it today.	
7-1	DNR 2115 Birchmont Beach Road NE Bemidji MN 56601	<p>The DNR will continue to collaborate with the USFS to maintain a forest road system that provides adequate access for natural resource management and opportunities for people to access public forest lands. We offer the following general guidelines for consideration as you decide which of the travel management actions to implement as part of the Moon Resource Project:</p> <ol style="list-style-type: none"> <li>1. The DNR supports the FS objective to make the public motor vehicle use designations for Forest Service Roads consistent for highway licensed vehicles and OHVs by either opening to a" motor vehicles or closing to a" motorized vehicles (except snowmobiles).</li> <li>2. When public motor vehicle use of an existing road is sustainable, that is when the route can be repaired or maintained to support motor vehicle use and protect soils and water quality and avoid wetlands, the DNR supports designation of the route as open to public motor vehicle use to provide access to public forest lands.</li> <li>3. The DNR encourages the Forest Service to consider the comments of the local snowmobile clubs when deciding whether the roads that are used as parts of the Lost Girl and Eagle Country snowmobile trails are suitable for use by motor vehicles during the non-snowmobile season.</li> <li>4. The DNR supports mitigation efforts to prevent public motor vehicle use on the nonmotorized North Country Trail. The preferred approach is to use signs and/or physical barriers to prevent motor vehicle entry onto the North Country Trail where forest roads cross the trail. The fact that a road crosses the North Country Trail is not a sufficient reason to close a road that is otherwise sustainable for motor vehicle use. The North Country Trail is not a primitive or wilderness designation. In many</li> </ol>	<p>Thank you for your input. We will work to make road designation consistent and consider the comments of local snowmobile clubs.</p> <p>We look forward to collaborating with the State in managing roads across jurisdictional boundaries, for example FR2069A. This route crosses from NFS to State managed land and the route is part of the Eagle Country GIA snowmobile route.</p> <p>The 2007 OHV decision (pg 8) allows for site specific adjustments in future project specific analyses. The Moon EA considers adjustments of the 2792 road system by opening to OHVs in Alternative C. Note that not all decisions may appear immediately on an annually updated MVUM as the implementation of a decision is dependent upon mitigation, partnerships, funding, and completion of timber sales.</p>

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		locations the North Country Trail is still routed along roads that are open to motor vehicle use.	
7-2	DNR 2115 Birchmont Beach Road NE Bemidji MN 56601	1. Road 2069A: Our preference is to keep this road open to all motor vehicles from the north into Section 16 of 141-26 as proposed in Alternative B. It is a minimum maintenance state forest road on the state land in Section 16 and there is some motor vehicle use of the route. We have no concerns about closing Forest Roads 2076 and 2066 to the south of the state land to motor vehicle use given the nature of the soils and drainage in this area as proposed in Alternative C. We recommend you consider the input from the local snowmobile clubs when making a decision on motor vehicle use in the 'South of Remer' area between Highway 200 and County Road 7.	FRs 2066, 2069A, and 2076 (one of the proposed ATV routes) (EA, pg 88)  Road 2069A crosses from NFS to State jurisdiction. The route is part of the Eagle Country GIA snowmobile trail. We understand the social importance of this route as well as Forest Plan direction to protect soil, aquatic, and wildlife resources. (EA, pg 88)
7-3	DNR 2115 Birchmont Beach Road NE Bemidji MN 56601	2. Road 2069B: We support keeping this road open to motor vehicle use as proposed in Alternative C if it is sustainable (mitigations SAI, TV1)	FR2069B is currently open to HLVs only. Field checks appear to show that the route also gets OHV use. This entire segment has spotty, slight to moderate rutting and ponding of water (from HLVs and large OHVs). Soils (heavy loam tills) would not support HLV or large OHVs without some surfacing and maintenance. However, we understand the social importance of this route as well as Forest Plan direction to protect soil, aquatic, and wildlife resources. (EA, pg 88).
7-4	DNR 2115 Birchmont Beach Road NE Bemidji MN 56601	3. FR2792 System: The DNR supports Alternative C which keeps the roads in this system open to motor vehicle use with mitigations SAI, TV1, and TV2. This will maintain public motorized access to several thousand acres of federal, state, and county forest lands. Where roads open to public motor vehicle use cross the North Country Trail, signs and/or physical barriers should be used to prevent entry of motor vehicles onto the non-motorized trail.	Field review (described below) shows that the physical resources are in good condition and that the North Country Trail can be adequately protected through signing and placement of physical barriers.  FR2792 is a crowned and ditched road in generally good condition (could use some spot gravelling) up to roughly the intersection with Spur C. The remaining portion of FR2792 and spurs A, C, D, and E are all native surface roads with little to no maintenance currently; little impacts; and minor signs of ATV use.
7-5	DNR 2115 Birchmont Beach Road NE Bemidji MN	4. FR2792F: We recommend a uniform motor vehicle use designation for the entire length of this road. The 2010 MVUM indicates this road is only open to highway licensed vehicles. The maps in Appendix A of the EA propose a change only for the	We agree and we are working towards consistent management of Forest System Roads by either opening or closing a road to motorized use. Our alternatives for the FR2792 system reflect this planning. The Moon project no action alternative reflects the 2009 forest road designations for motorized vehicles (EA, pg 87).

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	56601	portion of the road north of Mink Lake.	
7-6	DNR 2115 Birchmont Beach Road NE Bemidji MN 56601	5. Road 3579B: This appears to be the best access route into the adjacent state land. A temporary block instead of the proposed obliteration, would be our preference; something easily opened or temporarily removed while forest management activities take place would work for our needs.	We will close this road with an easily opened or temporarily removable closure rather than obliterate to allow administrative access to state lands.
7-7	DNR 2115 Birchmont Beach Road NE Bemidji MN 56601	6. Road 3571: Our preference would be to keep it open to all motor vehicle use if it is sustainable instead of the proposed obliteration. It's a dead end road that provides public access into state land. The nearby Road 2583 that leads to the same block of state land is proposed for closure to all public motor vehicle use.	We will consider keeping FR3571 open if it is sustainable. If not, then we will consider closing the road rather than obliterating it to retain State land access.
8-1	BRC 4555 Burley Drive Suite A Pocatello ID 83202-1921	the EA contains a few critical flaws that must be addressed in the Final EA.  It seems obvious from reading through the Scoping comments that partnerships with the OHV community could be improved.	It should be noted that the EA you received for 30-day comment was the final document. It will not be updated. Rather, comments and our responses will be considered in the Decision Notice signed by the District Ranger. All 30-day comments are considered prior to the Ranger's final decision.  The Ranger District has developed positive and collaborative working relationships with many OHV and snowmobile club members.
8-2	BRC 4555 Burley Drive Suite A Pocatello ID 83202-1921	The rationale for the proposed changes to the existing transportation system are not well understood by the public, are controversial and will negatively affect a significant portion of forest visitors. Therefore, our key suggestion for this project is to separate the travel management decisions from the vegetation management decisions. If we are interpreting the analysis in Chapter 3 correctly, the proposed changes represent a significant percentage of existing authorized routes (10-25% of the total open mileage?). Such significant changes to the transportation system should not be made within a vegetation management project.	The purpose for disclosing these changes was to inform the public. The 2007 Off-Highway Vehicle Road Travel Access decision, left some forest roads open to HLVs only and closed to OHVs. This built in management inconsistency and caused confusion. Simply put, it did not make sense to allow a large truck or passenger car to drive on a road but not allow a smaller ATV access when the highway licensed vehicle caused deep ruts in a minimally maintained road.  The 2007 decision contained inconsistencies that would be considered in future projects (EA, pg. 85 ) to eliminate the inconsistency, the IDT took a site specific look at each of the roads and determined if it was suitable to be open to all motorized vehicles or if should be closed. Alternatives B and C proposed different miles of each. (EA, Table 2-7)
8-3	BRC	The EA fails to clearly state the purpose and need	The Purpose and Need for changes appears in the EA, pg.4 and

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	4555 Burley Drive Suite A Pocatello ID 83202-1921	<p>for changes to the classified road and trail system.</p> <p>The agency has identified only miles open for significance indicator for Issue #2, despite numerous comments regarding route destination and connectivity.</p>	<p>5. P&amp;N statement 5 (Manage roads in the Forest Road system and propose changes in the uses of these roads; Open or close roads to all motorized vehicle uses).</p> <p>EA, pg4: <i>Travel management activities (MVUM, motorized vehicle use map)</i>: move the existing forest road system in the project area towards identified Forest Plan objectives and desired conditions<sup>2</sup>. This management activity affords opportunities for public comment and discloses pending changes to the MVUM. These changes would more consistently designate the type and timing of motorized use permitted on some forest system roads and, importantly, protect soil, aquatic, wildlife, and social resources in the project area.</p> <p>The analysis affects only National Forest System lands. The information provided in comment letters will be considered in the decision.</p>
8-4	BRC 4555 Burley Drive Suite A Pocatello ID 83202-1921	<p>NEPA imposes a mandatory procedural duty on federal agencies to consider a reasonable range of alternatives to proposed actions or preferred alternatives analyzed during a NEPA process</p> <p>In this case the “no action” alternative will not meet NEPA’s mandate to develop alternatives based on issues raised by the public.</p>	<p>The National Environmental Policy Act (NEPA) requires federal agencies to study, develop, and describe appropriate alternatives to recommended courses of action in any proposal that involves unresolved conflicts of alternative uses of available resources (42 U.S.C. 4332). “No specific number of alternatives is required or prescribed” for an EA (36 C.F.R. § 220.7 (b)(2)). There is no set number of alternatives required in order to reflect a reasonable range.</p> <p>Agencies have discretion to determine appropriate alternatives based upon the purpose of the proposal. Alternatives are typically developed based on issues that the proposed action do not address. They are usually identified during the scoping period due to public concerns or from internal discussions and help set the scope of the actions, the alternatives, and the effects to consider. According to Council for Environmental Quality (CEQ) (40 C.F.R. § 1501.7), there should be an “early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to the proposed action.” (Changes EA, p. 55-56)</p> <p>The No Action alternative is included to better compare effects of the action alternatives.</p>

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8-5	BRC 4555 Burley Drive Suite A Pocatello ID 83202-1921	<p>Page 19, section 3.2.1, describing the “no action” alternative, the EA states: Travel Management Objectives – Under the No Action Alternative none of the proposed transportation management activities would occur on NFS lands within the Project. The annual travel management map (MVUM) would continue to be released each year; however, opportunities to publicly disclose use changes and receive public comments and opportunities to consistently designate forest system roads as either closed or open to motorized uses would be limited or foregone.</p> <p>This statement is not accurate and must be removed from the Final EA. The annual MVUM review process directs the agency to assess and review any need for change in the classified road and trail system. Or, if the agency desires, at any time, it can initiate changes to specific roads, trails and areas if conditions or staff determine a need. The assertion that the proposed changes to the travel system would be “limited or foregone” if the no action alternative were chosen is not true.</p>	<p>We agree that the MVUM is updated annually and the agency can initiate changes to specific roads, trails and areas if a need is determined. However, under the No Action alternative, custodial management of system forest roads would continue and deferred maintenance would remain.(EA, pg 87)</p> <p>This EA opened a productive dialogue with the public and an opportunity to comment on Forest System Road changes.</p>
8-6	BRC 4555 Burley Drive Suite A Pocatello ID 83202-1921	<p>The Final EA should include a brief narrative regarding the progress of implementing the 2007 travel management project and what is still left to do. Information on the progress of decommissioning unauthorized roads and trails should also be disclosed.</p>	<p>Implementation of the 2007 OHV decision is ongoing. Site specific projects provide road by road review and the opportunity to update the MVUM. General information is found in annual Forest M&amp;E reports.</p> <p>The motor vehicle use map has been available free to the public since the latter part of 2008; updated maps were made available to the public for 2009 and 2010. The MVUM is the legal reference and indicates the routes that OHVs may be legally driven on. The intent of the Transportation Rule and the CNF Off-Highway Travel Access Decision is that the system of roads available for OHV use will be monitored each year and adjustments made as appropriate. Public comments on the Moon EA combined with CNF staff review of the existing OHV and other motor vehicle use opportunities have resulted in proposals to change motor vehicle access on some roads.</p>

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			<p>Communication with users, the map, signing, law enforcement, and ongoing education has increased the awareness by users. We continue to coordinate with State and County due to the checkerboard ownership patterns to make closures effective. Most forest system roads have been signed as shown on the MVUM.</p> <p>Decommissioning unauthorized roads and trails is ongoing (FY2008 M&amp;E, pg 43) Unauthorized roads are not reported in the Moon EA because they are not forest system roads. These roads are not part of the P&amp;N of the project, not on the MVUM, and outside the scope of the project.</p>
8-7	BRC 4555 Burley Drive Suite A Pocatello ID 83202-1921	The analysis concerning impacts of vehicle use on non motorized visitors is inappropriately focused on the North Country National Scenic Trail	See response 1-3.
8-8	BRC 4555 Burley Drive Suite A Pocatello ID 83202-1921	The EA fails to provide accurate and adequate cumulative analysis of motorized recreation opportunities	<p>Travel management in the Moon project area is depicted on the Motorized Vehicle Use Map (MVUM) that is updated annually as part of the 2007 OHV Decision commitment to the public (pg. 9) and EA, pg 83.</p> <p>The MVUM changes are tiered to the 2007 OHV decision (pg 8), "With this decision, there will be 1,486 miles (59%) of Forest Service system roads open for ORV use. There are 1,038 miles of system roads closed to ORV use. As a result of previous site specific analysis and decisions there are 110 miles of roads that remain closed seasonally to ORV use to protect threatened, endangered, and sensitive species; or other resource considerations. Prior to the OHV decision there were 1,530 miles (61%) of Forest Service system roads open for ORV use." These numbers have changed somewhat from 2008 based on annual updates to the MVUM. For more cumulative forestwide information see the FY 2008 M&amp;E (2009, pg 36-43).</p> <p>Forest Service managed lands are intermixed with private, state, and county lands and comprise roughly half of the land base (EA, Table 1-1, pg 2, Appendix A Vicinity Map). The road proposals consider connecting routes, interfacing with roads in other jurisdictions, nonmotorized trails, and resource issues.</p>

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			<p>A few roads are dual purpose road and recreation snowmobile trail. The majority of the roads are maintenance level 2 (ml 2) roads, or roads built for access utilizing high clearance vehicles. .</p> <p>Forest Service records show about 100 miles of FS system roads and about 160 miles of FS trails. The project area contains 105 ML2 roads (71 miles), of which, about 25 miles are included in the environmental assessment (RAP, pg 4).. The proposed changes in road management affect small segments of forest system roads (Appendix B mitigation, pg B-13-B14).).</p> <p>Forest Service roads comprise 49% of the project area roads (RAP, pg 4). Other road ownership is county forest (5%), MN DNR (4%), City Street (4%), State Highway (7%), Township (8%), County Highway (14%), and private (9%) for a total 101 miles. (EA, Table 3-31, pg 85)</p> <p>The Forest, with the cooperation of MN DNR, the Forest area County, Township, and City governments, and the Leech Lake Band of Ojibwe (LLBO), have been working with the general public to assess roaded, motorized recreation opportunities. Trends on private lands are not clear due to lack of data. Cass County has been working with Minnesota DNR, U.S. Forest Service, and the public to determine which roads and trails should be used for Off-Highway Vehicle (OHV) travel. This work is ongoing (<a href="http://www.co.cass.mn.us/land/trails.html">http://www.co.cass.mn.us/land/trails.html</a>).</p>
8-9	BRC 4555 Burley Drive Suite A Pocatello ID 83202-1921	The Final EA should include information regarding the cumulative loss of motorized recreation so that the changes proposed may be accurately assessed by the decision maker and the general public. This was a consistent theme in many of the Scoping comments. The Final EA should disclose how many roads and trails that existed within the project area were closed by the 2007 decision. This will better inform the public and the decision maker, and also help to properly asses the impacts of the proposed changes to the recreating public.	<p>The 2007 OHV decision presented closure information forestwide. Appendix A of that document lists the road status. The annual MVU maps update changes and are readily available in hard copy from any forest office or can be downloaded off the web. The Moon EA tiers to the 2007 OHV decision and the Forest Plan and cumulative changes are reported annually in the Forestwide M&amp;E report.</p> <p>From FY2008 M&amp;E (2009, pg 39): “During this year, changes in road access for motorized vehicles has been proposed and implemented. Forest projects, through the environmental assessment analysis, have closed roads and opened roads to OHV and/or highway licensed vehicle travel. Forest managers</p>

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			<p>have been able to ground-truth some Forest Service system roads in terms of the 2007 Travel Access Decision. With additional in-depth knowledge of roads as it lies on the ground, a review of the appropriateness of the 2007 OHV Travel Access Decision has been done. Also, many individuals have commented to land managers about roads they are interested in and whether that road should be open or closed to OHV travel. Many times a single road would garner comments from people wanting opposite decisions about the road motorized accessibility. Miles of OHV access potential change across the Forest will be identified in the 2009 Monitoring Report.”</p> <p>The FY2008 M&amp;E (2009) report on OHVs identifies opportunities, effects on the physical and social environment, and how effective the forest is in managing OHV use. These monitoring drivers for desired condition and objectives are 36 CFR 219.21[g], Forest Plan D-OHV-1, D-OHV-2. Detailed discussion is on pages 36, 37, 38. Table 13, pg 38 presents miles of Forest Service system roads open or closed to OHV use.</p>
9-1	The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	The Biological Assessment (BA) states, “The Moon project area is comparatively more fragmented, has more edge habitat, and has less interior forest than other areas of the Chippewa National Forest” (BA, 3). Creating large amounts of young forest can result in damage to soil and water resources, spread of non-native invasive species (NNIS) and most importantly destruction of important sensitive species habitat. The Sierra Club is concerned with the loss of large mature patch acreage as a result of this project. Large mature patches need to be preserved because of their importance to sensitive species.	<p>We agree that large mature patches are vital and prescribe appropriate harvest treatments to maintain the canopy.</p> <p>The number and acreage of large mature forest patches following implementation of either Alternative B or C would be more than the existing condition today (EA, pg.78). While the No Action alternative (Alternative A) does result in the largest increase in the number and acreage of large mature forest patches, it would do so without meeting other aspects of the Moon Project’s purpose and need.</p>
9-2	The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	Clearcutting is not the optimal method of “harvest,” especially in terms of achieving age and species diversity, because clearcutting increases habitat fragmentation, which lowers overall diversity by reducing suitable habitat for forest interior species. Clearcutting also leads to stands of single age species. This simplification of forest structure and composition reduces its ability to provide habitat for	<p>The Forest Plan (G-TM-7, pg 2-20) states “A full suite of timber harvest practices will be allowed. Harvest practices will generally be selected because they provide the most appropriate strategy to achieve or optimize achievement of multiple use management objectives.”</p> <p>Clearcutting is an appropriate harvest method to help meet Forest Plan objectives for the creation of 0-9 age class, and forest type</p>

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		<p>a diversity of forest wildlife species. The frequency of clearcuts in the project area should be significantly reduced in favor of minimizing fragmentation and increasing species diversity through the use of plantings and fire. How will clearcutting patterns mimic the complicated disturbances created in nature, such as fire?</p>	<p>objectives for the Landscape Ecosystems.</p> <p>The amount of 0-9 age class created through clearcut, patch clearcut, coppice, and shelterwood harvests acres is 1,268 acres under Alternative B and Alternative C (EA, Table 2-1, pg 15).</p> <p>These harvests create young forest stands that provide multiple benefits. For example, reserve trees under the clearcut with reserves and coppice with reserves harvest treatments provide future snags, large woody debris, wildlife seed sources, or meet visual concerns. Patch clearcuts regenerate smaller areas to encourage young forest habitat for grouse and woodcock. Shelterwood with reserves harvests regenerate stands while retaining overstory to meet visual concerns, wildlife values, riparian emphasis management objectives. In some stands, existing natural regeneration of hardwoods or balsam fir is released via harvest operations. (EA, pg 21-22)</p>
9-3	<p>The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024</p>	<p>Tree plantations have little structural or species diversity. They are ecologically unstable and more susceptible to weather, fire and pests. How many plantations are located within the project area? Where are they and how large are they? The EA states that one of the goals of this project is to; "Improve growth and vigor of plantation origin red pine, increase or maintain within stand species diversity, and begin to create more natural spacing and structure within plantation origin red pine stands" (EA, 5). The Sierra Club believes that all tree plantations in the project area should be returned to their natural range of variability and not used to provide timber to the timber industry. Instead of focusing this project on thinning conifer plantations to increase timber output it would be beneficial to focus on restoring conditions more representative of native vegetation communities by increasing structural and species diversity.</p>	<p>Appendix A, stand lists for Alternatives B and C identifies each red pine stand to be thinned by compartment / number and treated acres (i.e., the red pine plantations). The EA, Table 2-1, pg 15 shows 1,042 acres thinned under Alternative C. If you look at the Alternative C map, you will find the location of each commercial thin.</p> <p>We are meeting Forestwide management direction O-VG-9, pg 2-22 and O-TM-1, pg 2-19. Thinning creates more natural spacing and structure and improves the growth of plantation origin red pine and addresses P&amp;N statement #4 to provide commercial wood for mills in northern Minnesota. (EA, Table 1-2, pg. 6-7)</p> <p>Using scoping comments received from the public, other agencies, the LLBO DRM and Kego-Smokey Point LIC, and addressing internal management concerns, the interdisciplinary team identified commercial thinning as a key issue.</p>
9-4	<p>The Sierra Club North Star Chapter</p>	<p>The EA states "In this project, biomass harvest would be allowed in certain stands with clearcut or shelterwood harvests where mechanical site prep</p>	<p>Mitigations are included in the EA (Appendix B, S4, S5, S6 mitigations for soil) that retain vegetative material on sites where nutrient levels are a high concern. The mitigations are listed on a</p>

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	2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	<p>for seeding or planting was identified. In these stands, biomass harvest would achieve objectives of slash removal, soil exposure, and soil scarification while retaining residual trees and inclusions as described above” (EA, 22).</p> <p>How much and what types of biomass does the Agency plan to sell and which units will it come from? How will this removal of biomass affect wildlife? Good lynx denning habitat has large amounts of coarse woody debris to provide escape and thermal cover for kittens, how will harvest of biomass affect lynx? How will this removal of biomass affect soils, and the future health of vegetation that will be deprived of these nutrients?</p>	<p>stand by stand basis. The effects of biomass removal on soils is discussed in the EA, pgs 62-63, “Recent studies suggest that if current BMPs are followed, biomass removal would not detrimentally affect soil productivity (MFRC 2007); however the CNF requires slash retention (G-WS-10) in these areas (Forest Plan 2004) unless site specific conditions warrant otherwise.”</p> <p>The amount and location of biomass to be sold is written into the prescription and we offer it through the timber sale contract or through a post-sale contract. The amount to be sold is a function of the prescription and post-harvest activities.</p> <p>Biomass removal was not specifically analyzed with respect to wildlife. The Minnesota Forest Resources Council Voluntary Site-level Forest Management Guidelines or “Gold Book” best management practices (BMPs) for biomass removal will be followed in all cases (Forest Plan, pg 1-5). These BMPs would mitigate, but not eliminate, the negative impacts caused by biomass removal to wildlife or other resources.</p> <p>For the Canada lynx, habitat indicators are assessed on pages 14-16 of the Moon BA. The conclusion reached in the Moon BA is that all alternatives are not likely to adversely affect Canada lynx or its habitat.</p> <p>In regards to soil nutrient retention concerns, the Chippewa National Forest relies on the combination of guidelines developed from the Voluntary Site-level Forest Management Guidelines (Biomass Harvesting Guidelines addendum, December, 2007) and from guideline G-WS-10 in the 2004 Forest Plan. Both sets of guidelines were developed based on scientific research on the effects of harvesting on soil productivity. Guidelines very similar to these are used on a region-wide basis. (FY2008 M&amp;E 2009, pg 91)</p> <p>Biomass harvest is not apt to utilize the fine twigs, needles and leaves which contain a substantial portion of the available nutrients. These would still be available for decomposition.</p>
9-5	The Sierra Club North Star	The Sierra Club supports efforts to increase upland conifers such as white pine, red pine and spruce-fir,	The Forest Plan identifies forest type objectives for landscape ecosystems. In some of the ecosystems there is a need to

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	Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	and decrease the amount of aspen. However, there is a concern that sometimes aspen stands are harvested and then allowed to grow back exactly the same. How will the Agency avoid perpetuating aspen monoculture stands?	increase the amount of conifer component and convert aspen stands to a conifer forest type. The LEs also contain objectives for the amount of aspen that is to be maintained and regenerated to aspen (EA, Table 1-2, pg 6; Table 3-6, pg 44; Tables 3-7, 3-9, 3-11 pgs 45, 47, 49, 51).
9-6	The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	The Sierra Club supports efforts to maintain and increase large mature patches greater than 300 acres. However there is still going to be a loss of one mature patch in the 501-1000 year age class (EA, 78). This patch should be maintained. It is important to not lose any mature patches. It is also important to not decrease the size of any patches. The Agency should reduce planned harvests that result in decreasing the size of existing mature patches.	All of the alternatives considered in the Moon Project would move the project area towards the forestwide objective of maintaining or increasing the acres and number of large mature upland forest patches. While Alternatives B and C result in fewer number and acres of large mature forest patches than Alternative A, no loss of existing forest patch numbers or acres is occurring in Alternatives B or C.
9-7	The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	The Sierra Club is pleased to see that the Agency is proposing to close several roads, but steps also need to be taken to effectively decommission more roads.	Steps have been and will continue to be taken to effectively decommission roads. Closure effectiveness is monitored annually in the FY2008 M&E (2009, pg 10) as well as the success of revegetation. As issues are discovered during monitoring (e.g. failed closure structures, illegal access, or poor revegetation), remediation steps are taken to address site specific problems (e.g. replacing a slash block with boulders, increased law enforcement, or supplemental planting). Concerted efforts have been and will continue to be made to increase public awareness and to collaborate with other law enforcement units for more effective road closures (FY2008 M&E 2009, pg 4).
9-8	The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	The EA takes steps to document ways to effectively decommission roads. The EA states that, "Roads or trails closed or obliterated would be physically blocked with trees, slash, berms, boulders, or a combination thereof. Without additional road treatment, aquatic resources would recover naturally over one or more growing seasons depending on existing conditions. Road obliteration may include additional mechanical treatments such as the following: ripping the road to uncompact the soil and improve water infiltration and plant growth, drainage crossing structure and wetland fill removal	Enforcement of road closures has and will continue to be an issue in the project area mainly due the size of the area that must be managed and the amount of motorized use within it. As illegal activities are found through formal monitoring or observations, they are brought to the attention of law enforcement.  Due to the sheer bulk of user-developed roads and trails within the project area, road/trail density is always an estimate. We disagree that this estimate is a reason to believe that future closures in the project area will be ineffective.  The Chippewa NF has closed roads with a variety of methods

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		<p>to reestablish natural flow and wetland plant communities, and beaver dam removal to avoid future flooding or erosion. These additional treatments would speed up the rate of aquatic resource recovery" (EA, 58). "Road obliteration may include removing wetland fills and drainage control structures or ripping the road to uncompact the soil. This would speed up the rate of soil recovery" (EA, 63). While these steps sound promising, if they are not actually implemented, or not implemented successfully they are meaningless.</p> <p>After explaining all the ways the Agency will and should work to effectively decommission roads it is disturbing to read in the BA how ineffective it has been so far. The BA states, "While road closures are potentially a good thing for species like the lynx or the gray wolf, it is not clear if road closures can be enforced in the long term. Illegal off-highway vehicle use is widespread in the project area.</p> <p>The miles of illegal OHV trails are not reflected in the road/trail densities shown in the table for indicator 15, nor are they fully known. I observed illegal OHV trails or signs of illegal use in nearly every corner of the Moon Project Area in 2010. Because of this, it appears improbable that proposed closures will be effective.</p>	<p>over time. Some methods have been found to be more effective in a given circumstance than others. Gates, berms, rocks, vegetative closures (downed trees and brush, etc.) or a combination have all been used. Closures have been found to be successful in approximately 62% of the time. (FY2008 M&amp;E 2009, pg 42).</p> <p>Monitoring of road closures has found that few historically standard closures such as gates, berms and/or rocks across the roadway can close a road to an ATV rider intent on using the road. Road closures must be done effectively and the specific strategy is dependant on the road and its' environment. Examples of effective closures include: large rocks weighing 5,000 pounds or more have been found to not be movable with an ATV and felling vegetation and brushing in a road for more than 50 feet in the road corridor. Other opportunities to implement successful closures based on the site should be taken every time a road is closed to OHVs and/or decommissioned. (FY2008 M&amp;E 2009, pg 42)</p> <p>As discussed in the response to the previous question, 9-7, additional steps are taken to remediate problems as they are found. These experiences are used to improve upon closures in the future.</p> <p>The outcome of monitoring is potential change in management within the context of the Forest Plan. The work done to implement the Forest Plan and Travel Management Rule is ongoing, iterative and specifically involves many components such as roads, signs, trails and available motor vehicle use maps, and law enforcement (FY2008 M&amp;E 2009, pg 42).</p>
9-9	The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	<p>The EA states, "About 10 miles of temporary roads would be built to access some of these treatment units" (EA, 7). "Temporary roads would be decommissioned and revegetated following harvest and reforestation activities" (EA, 23).</p> <p>Why does the EA not reference the problems the Agency has been facing with effectively decommissioning roads and controlling illegal OHV</p>	<p>The 10 miles reflects a projection from scoping. The revised number (about 1.2 miles) is given in EA, Table 2-2, pg 16, for Alternatives B &amp; C.</p> <p>Temporary roads are authorized by contract, permit, lease, other written authorization, or emergency operation that are not intended to be a part of the forest transportation system, and not necessary for long-term resource management. These roads are not included on the NFS road inventory and are decommissioned</p>

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		trespass? These roads should not even be called temporary roads, but permanent roads, since apparently that is what they will become. They should be analyzed in terms of assuming that they will not be effectively closed. Additional environmental review is needed to determine how these "permanent" roads will affect the environment post-project completion.	<p>after use. (EA, pg 127)</p> <p>Effectively decommissioning roads and controlling illegal OHV trespass is a forestwide issue and monitored across the CNF.</p> <p>As reported in the FY2008 M&amp;E (2009), Monitoring Road Closure Effectiveness : The effectiveness of existing road closures continues to be monitored. Information was gathered the field season of 2008. The information contained in this report is important to OHV use on the CNF because approximately 854 miles of roads of low standard roads are closed to OHVs and many of these roads have some form of visual closure devices. Field information indicates issues with the effectiveness of some closure devices and signing.</p> <p>There are two law enforcement officers and 21 forest protection officers on the CNF. Enforcement of forest orders and other appropriate 36 CFR regulations occurs as needed on the Forest. For many years, including 2008, there has also been a Cooperative Law Enforcement agreement with Cass and Itasca Counties that provides for a county deputy to work a certain number of days per year that are concentrated on National Forest land (FY2008 M&amp;E 2009, pg 38).</p>
9-10	The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	What is the state of current stream crossings in the project area? Could any be decommissioned? Are there any in need of repair? How does the Agency monitor existing stream crossings and newly built stream crossings to make sure they are functioning properly? How many new stream crossings will be built for this project? How will water resources near proposed new roads (temporary roads and roads to be opened) be protected?	<p>There are roughly 43 stream crossings in the project area across all jurisdictions, some of which are in need of repair. An assessment was just completed this year that identified structures that were barriers to fish passage. This assessment was an addendum to assessments that occurred in past years identifying barriers and erosion concerns.</p> <p>No new stream crossings are proposed within the project area that would require installation of a drainage control structure. Temporary roads necessary for timber extraction will be built so as to avoid crossing a stream. If crossing is unavoidable, temporary bridges or winter access during frozen conditions are examples of means used to access timber and protect soil and water resources.</p>
9-11	The Sierra Club North Star Chapter	The Sierra Club is concerned that with the proposed road building and opening up of roads that non-native invasive species (NNIS) will spread	The Chippewa National Forest is also concerned about the spread of non-native invasive plant species. We will continue to conduct inventories for weed species including those that you list,

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	2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	in the project area. NNIS often enter an area along a corridor of ground disturbance, such as a new road. NNIS occurrences along roads often spread into the harvest area where ground-disturbing activities have taken place. Of particular concern is buckthorn, garlic mustard, spotted knapweed, leafy spurge, and purple loosestrife. Reduced road building and harvesting will lessen the threat of NNIS.	monitor known sites, and treat infestations of high priority species.
9-12	The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	... effects of mechanical treatments on soil resources. Landing and primary skid trails impact soil through soil compaction, reduced water infiltration, increased potential for erosion and reduced vegetation growth and regeneration. The EA states, "Repeated passes over the ground with heavy equipment would reduce ground cover and compact soil (64)".	<p>The effects of mechanical treatments on soils is discussed in the EA ,pages 64-65. Despite the risks, disturbance in either alternative would not be detrimental to soils or would occur on a small enough percentage of treatment areas to meet R9 soil quality standards (FSH 2509.18). The effectiveness of BMPs, mitigation, and design features, discussed below, supports this assessment (see Appendix B for a comprehensive list applied to treatments in this project).</p> <p>To reduce the spatial impact of infrastructure, the amount of area occupied by log landings and temporary roads generally would not exceed 3% of a treatment unit and skidding would be focused on existing skid trails. Timber harvest monitoring from 2004-06 has shown that Forest Service infrastructure percentages remain below recommended guidelines and across all ownerships skidding has generally been focused on existing trails or randomly distributed lightly over sites (EA, pg 64).</p>
9-13	The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	No harvesting should occur on steep slopes. The EA states, "Steep slopes occur over roughly 1% of the project area. They become an erosion concern when mineral soil is exposed. Soil loss removes nutrients from a site which affects plant growth. Soil deposited in a nearby waterbody may detrimentally affect water quality or aquatic habitat" (62)	Steep slopes occur over roughly 1% of the project area (EA, pg 62). Timber stands were filtered to avoid steep slopes. Mitigations are applied to harvest stands as part of BMPs (Appendix B, S1 mitigation, "Minimize new infrastructure construction, avoid heavy equipment operations on steep slopes, and use measures that control runoff and erosion as necessary.")
9-14	The Sierra Club North Star Chapter 2327 East Franklin	The EA states, "About 3% of soils within the project area project area have excessive drainage and are inherently low in nutrients. These sites may be susceptible to nutrient depletion when natural inputs are not sufficient enough to replace biomass	<p>See response 9-4.</p> <p>Mitigation numbers S2-S6 in Appendix B specifically address concerns of soil compaction, rutting, and nutrient loss.</p>

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	Avenue, Suite 1 Minneapolis, MN 55406-1024	removed with harvest. More than one-fourth of soils within the project area have poor drainage. These soils are most susceptible to compaction since they remain wet for all or most of the year” (62).	
9-15	The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	Appendix B states that a minimum of 20% of all tops and limbs from harvested trees will be retained and scattered evenly over the site (Appendix B, 1). Why does the Agency feel that 20% is an adequate number to retain nutrients for soil? Does this number change depending on the condition of the soil at each harvest site? How does this work with biomass harvesting?	A substantial portion of the available nutrients are located in the small twigs, leave and needles of a tree. The 20% follows BMP guidelines (Voluntary Site-level Forest Management Guidelines, Biomass Harvesting Guidelines addendum, December, 2007) and from guideline G-WS-10 in the 2004 Forest Plan.. (See mitigation number S5 in Appendix B).  See response 9-4.
9-16	The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	High road densities lead to stream channel stability issues and negative impacts to aquatic organisms. The EA states that, “Eighteen of the 29 watersheds crossing the project area currently exceed 2mi/mi2” (57). Focusing on road decommissioning will result in improved conditions for water resources. Opening these routes to a wider range of motorized use will likely intensify pressures on soil and aquatic resources” (63). We continue to realize the far-reaching negative effects that roads have on our forests. No new roads should be open to motorized vehicles and no temporary roads should be built.	To clarify, the 2007 OHV decision did not change the use of highway licensed vehicles, such as passenger cars, on Forest System Roads (Decision Notice, pg 2). This EA addresses this inconsistency through Key Issue #2:  <i>Opening or closing forest system roads to all motorized vehicles may affect recreation opportunities and natural resources. Some roads shown on the 2009 MVUM travel management map are open only to highway licensed vehicles and closed to off-highway vehicles. The Walker Ranger District is working to eliminate these inconsistencies by designating most roads as open or closed to all motorized vehicles. Where appropriate some roads may be partially opened or closed to protect soil, water, or wildlife resources. Road management proposals are based on the Forest Road system as shown on the 2009 MVUM.</i>  Bringing routes up to maintenance level standards, prior to opening routes to OHVs would likely avoid or minimize existing aquatic and soil impacts. (EA, pg 11, 20, 21)  Opening these routes to a wider range of motorized use will likely intensify pressures on soil and aquatic resources.(EA, pg 63). About 8 acres of soil in Alternative B and 14 acres in Alternative C would potentially be disturbed. To support the motorized use proposed and protect soil and aquatic resources, these roads and trails would be repaired or rebuilt, which may include seeding, brushing, grading, surfacing, or installation or replacement of

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			drainage control structures. Annual maintenance would also be needed to assure sustainability into the future. (EA, pg 63-64)
9-17	The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	Harvesting near water resources has the potential of harming that resource. How will nearby water resources be affected by harvesting within the riparian management zone (RMZ)? While long term goals of increasing long lived tree species may benefit riparian areas, short term effects may cause them damage, especially when excessive harvesting takes place.	Mitigation numbers A1-A7 in Appendix B specifically address concerns of harvest impact on water resources.  Short-term impacts to aquatic resources may occur as a result of soil compaction or erosion; however they would largely be addressed by implementation of BMPs, mitigation, and design features (Appendix B for a comprehensive list applied to treatments in this project). Timber harvest monitoring from 2004-2006 has shown that infrastructure has generally been located outside of filter strips, an infiltration zone protecting nearby waterbodies. Where infrastructure has been found within filter strips nearly all sites had no greater than 5% soil exposure (EA, pg 59)
9-18	The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	Wetland areas need to be protected and preserved. Will harvesting take place on or near wetland areas? While conducting treatments during frozen conditions minimizes impacts, it does not completely eliminate them. There is still the potential for rutting and compaction to occur. Treatments planned in wetland areas should be dropped from the chosen Alternative.	No forested wetlands are proposed for treatment in the project area. However, wetlands do occur as inclusions within upland treatment units. Wetlands are avoided during harvest operations. If a portion of a wetland must be crossed to access timber, it will be done so under frozen conditions. If during operations it is discovered that the soils are not frozen enough to prevent rutting or soil compaction, all operations are shut down until conditions improve.
9-19	The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	how project harvesting will impact sensitive species in the project area. Of particular concern are Northern goshawk, red-shouldered hawk, black-throated blue warbler, black-backed woodpecker, gray wolf and Canada lynx. Loss of mature patch acreage will affect many sensitive species. For many sensitive species, simply maintaining adequate habitat is not enough. Instead, improvements need to be made otherwise these species will never be able to make a recovery.	The Biological Evaluation and the Biological Assessment for the Moon Project detail the effects to Regional Forester's Sensitive Species and Federally listed threatened or endangered species, respectively. Both are found in the Moon project record and are summarized in the EA. While there are measureable effects to the species' habitats that you list as a result of the Moon Project, after implementation there would be more mature/older forest and more mature/older upland forest patches than currently exist in the Moon Project area. Additionally, mitigation measures are prescribed for some species where applicable that help to limit adverse effects.
9-20	The Sierra Club North Star Chapter 2327 East Franklin	Vast improvements in potential habitat need be made for the black-throated blue warbler, the Northern goshawk and the red-shouldered hawk. All three of these species need extensive areas of mature forest and adequate canopy cover.	See response 9-19

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	Avenue, Suite 1 Minneapolis, MN 55406-1024	Clearcutting will result in favorable conditions for predators and further fragmentation of current and potential habitat. For Northern goshawks and red-shouldered hawks, reduction of foraging habitat and reduction of potential nesting and breeding habitat will not contribute to the recovery of these raptors. The Biological Evaluation (BE) states, "However, given what we know about goshawk habitat requirements, many of the known territories on the Forest do not appear to be in a healthy condition. Known sites on the Forest continue to need protection and management, using the best information and parameters available. Without this effort, the long-term sustainability of the species on the Chippewa would be uncertain at best" (BE, 31). "Potential for direct effects exist in stands proposed for harvest because red-shouldered hawk nests and breeding activity are dynamic. The possibility exists that harvest activity could impact nests established since surveys were last conducted" (BE, 35-36).	
9-21	The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	<p>reductions in suitable lynx habitat and lynx prey habitat as a result of this project. The BA states, "Alternatives B and C in the Moon Project would change 935 acres of lynx habitat to an unsuitable condition" (BA, 15).</p> <p>Existing conditions are not contributing to the recovery of the lynx, thus they remain on the endangered species list. Only when forest conditions are improved will lynx populations improve.</p> <p>Roads can be very detrimental to the survival of lynx. The current road situation in the project area and the proposed changes called for under this project, including building of temporary roads and opening up of roads, needs to be reevaluated. Temporary roads should not be built and roads should not be opened to additional traffic. Efforts still need to be made to bring road densities in LAU</p>	<p>In accordance to section 7 of the Endangered Species Act of 1973, we consulted with the US Fish and Wildlife Service on the assessed effects of Alternative C to the Canada lynx. The BA made the determination that Alternative C may affect but will not likely adversely affect the lynx. The FWS concurred with this determination.</p> <p>You correctly state that a total of 935 acres of lynx habitat may be put into an unsuitable condition. However, in total, both Alternatives B and C maintain less than 30% of LAUs in an unsuitable condition (Forest Plan guideline G-WL-3) and do not change more than 15% of lynx habitat on NFS land in LAUs to an unsuitable condition (Forest Plan standard S-WL-1) (BA page 22). The Chippewa is working within the management direction in the Forest Plan for the lynx.</p> <p>Additionally, both action alternatives reduce road density (BA table Indicator 15, p. 17) over existing condition and move LAUs 20 and 21 toward a road density of less than 2 miles/square mile.</p>

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		<p>20 and 21 below the 2 mile/square mile threshold. Since temporary roads will likely not be effectively closed, further analysis needs to be conducted as to how these roads will affect lynx. The EA states, "In terms of the potential future road density of inventoried roads in the Moon Project Area, it appears the transportation proposal for the action alternatives helps to improve the project area for the lynx. However, the road density indicators do not quantify the miles or the effect of illegal cross-country OHV trails. Despite reductions in road density, federal lands in the project area will remain highly accessible by system roads and trails, or illegal trails" (20). "Overall road density would remain over the threshold and roads may continue to adversely affect the lynx in this LAU for the foreseeable future" (BA, 20).</p>	<p>Illegal OHV use and trail creation is a law enforcement issue that is ongoing.</p>
9-22	<p>The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024</p>	<p>Roads can be very detrimental to the survival of lynx. The current road situation in the project area and the proposed changes called for under this project, including building of temporary roads and opening up of roads, needs to be reevaluated. Temporary roads should not be built and roads should not be opened to additional traffic. Efforts still need to be made to bring road densities in LAU 20 and 21 below the 2 mile/square mile threshold. Since temporary roads will likely not be effectively closed, further analysis needs to be conducted as to how these roads will affect lynx. The EA states, "In terms of the potential future road density of inventoried roads in the Moon Project Area, it appears the transportation proposal for the action alternatives helps to improve the project area for the lynx. However, the road density indicators do not quantify the miles or the effect of illegal cross-country OHV trails. Despite reductions in road density, federal lands in the project area will remain highly accessible by system roads and trails, or illegal trails" (20). "Overall road density would remain over the threshold and roads may continue</p>	<p>See response 9-21</p>

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9-23	The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	<p>to adversely affect the lynx in this LAU for the foreseeable future” (BA, 20).</p> <p>... how this project will contribute to climate change. The Chippewa National Forest is already a highly fragmented forest – the best defense our boreal forest ecosystems have against rising temperatures is to remain as intact, and unfragmented, as possible. Large blocks of forest will be most resilient, plus provide the most carbon sequestration capacity. Logging and biomass removal will contribute to climate change. How will this project meet the requirements of the MN 2007 Next Generation Act to reduce emissions of CO2 by 15% by 2015 and 80% by 2050? How will this project affect carbon flows? How does this project combined with past, present and future projects affect carbon flows?</p>	<p>Because the majority of Forest Service projects are extremely small in the global atmospheric CO2 context, it is not presently possible to conduct quantitative analysis of actual carbon change effects based on individual or multiple projects. With respect to our project, knowing the effects on carbon is not key information the line officer would use in deciding among the project alternatives. Rather meeting the purpose and need for the project, addressing the issues, and achieving a balance of resource objectives are key considerations when making a decision.</p> <p>The Chippewa National Forest contains Forest Plan direction for moving toward increased diversity in amounts, conditions and patterns of vegetation (Vegetation Desired Conditions Forest Plan pp 2-41 and 2-22). This will result in forests that are more resilient to change. Not taking action to improve ecological health will likely result in lower carbon capture and storage (carbon sequestration) and increased carbon emissions in the future as the result of wildfire and losses from insects and disease. The Moon Project maintains or increases mature/older forest patches and creates diversity through uneven-aged vegetation management (Table 2-7).</p> <p>MN 2007 Next Generation Act : This legislation applies to Minnesota electric utilities and is irrelevant to land management.</p> <p>As long as growth exceeds removals, the forest is sequestering carbon. A 2004 report by the Union of Concerned Scientists (<a href="http://www.ucsusa.org/publications/catalyst/fa04-catalyst-forest-carbon-sequestration.html">http://www.ucsusa.org/publications/catalyst/fa04-catalyst-forest-carbon-sequestration.html</a>) stated that; “ Even a forest that undergoes regular harvesting can act as a carbon sink as long as yearly growth exceeds the amount of carbon removed during harvest.” In Minnesota, the “Overall net growth for all species continued to outpace harvest levels. According to 2007 FIA figures, annual net growth of growing stock on timberland was approximately 5.8 million cords and net mortality of approximately 3.10 million cords.” (Minnesota’s Forest Resources, December 2008, p. 3.)</p> <p>The 2000 RPA assessment also notes that “production and use of wood products in place of alternate products can reduce carbon</p>

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			<p>emissions" (Interim Update of the 2000 Renewable Resources Planning Act Assessment, pp 83-85).</p> <p>Forest Plan direction for moving toward increased diversity in amounts, conditions and patterns of vegetation (Vegetation Desired Conditions Forest Plan pp 2-41 and 2-22) will result in forests that are more resilient to change. Not taking action to improve ecological health will likely result in lower carbon capture and storage (carbon sequestration) and increased carbon emissions in the future as the result of wildfire and losses from insects and disease.</p>
9-24	The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	This project fails to assess how the removal of mature older forest and the additional miles of roads will further impact existing ecosystems in combination with the effects of climate change within the Chippewa National Forest.	<p>All of the alternatives considered in the Moon Project would move the project area towards the forestwide objective of maintaining or increasing the acres and number of large mature upland forest patches. While Alternatives B and C result in fewer number and acres of large mature forest patches than Alternative A, no loss of existing forest patch numbers or acres is occurring in Alternatives B or C.</p> <p>There are no additional miles of roads open to motorized vehicles—these roads are now open to highway licensed vehicles under Alternative A. The issue considered in Alternatives B &amp; C is whether to open or close some forest system road segments to all motorized vehicles (passenger cars, trucks, SUVs, OHVs).</p>
9-25	The Sierra Club North Star Chapter 2327 East Franklin Avenue, Suite 1 Minneapolis, MN 55406-1024	The Forest Service should comprehensively assess the effects in light of climate change. It is recommended that the Forest Service should prepare and include a climate change ecological resilience and resistance plan. This plan would identify the biological and ecological elements in the Chippewa National Forest that are most at risk by climate change, as well as the additional risk provided by implementing this project. The plan should identify methods that would assist plants, animals, and ecosystems in adapting to climate change.	Forest Plan direction for moving toward increased diversity in amounts, conditions and patterns of vegetation (Vegetation Desired Conditions Forest Plan pp 2-41 and 2-22) will result in forests that are more resilient to change. Not taking action to improve ecological health will likely result in lower carbon capture and storage (carbon sequestration) and increased carbon emissions in the future as the result of wildfire and losses from insects and disease.
10-1	LLBO 115 Sixth Street NW. Suite E,	Table 1-1: Protection of wild rice habitat has recently been highlighted by CNF through its participation in cross-agency collaborations and	Management Area definitions are set in the Forest Plan and not subject to modification in a project level EA. Forest Plan objectives, standards, and mitigations are already in place to protect riparian

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	Cass Lake, MN 56633	funding searches aimed at this (Don Rees, lead CNFrepresentative on such efforts). Please include wild rice habitat protection under Purpose for Riparian Emphasis MAs.	emphasis MAs.
10-2	LLBO 115 Sixth Street NW. Suite E, Cass Lake, MN 56633	1.4 P&EStatement 3: The Moon EA discusses or implies providing habitat for mid and late successional species (e.g., p 12). Please include this as a third bullet point here (p 5).	Providing habitat for mid and late successional species is part of P&N Statement 1.
10-3	LLBO 115 Sixth Street NW. Suite E, Cass Lake, MN 56633	1.8 KeyIssue #1: The Moon EAdiscusses moving plantations to a more natural condition of structure and composition. Please tie the nearly doubling of proposed thinning in Alternative C directly to this goal of diversifying plantations on the CNFand include measures of diversity as an indicator (p 11). Diversification of plantations can help address the issue of threats from changing climate, forest pests, and invasive species by increasing resilience on the landscape.	Key Issue #1 talks about increasing the amount of commercial thinning and contributing to increased productivity of the stands. This issue relates directly to comments received during the scoping period for the EA.  The Purpose and Need for the EA also discusses maintaining or increasing within stand diversity in conifer stands. This will occur during the harvest prescriptions by maintaining and promoting diversity that is currently present in the plantations.
10-4	LLBO 115 Sixth Street NW. Suite E, Cass Lake, MN 56633	Table 2-1: LLDRM recognizes the challenges of managing forestland for multiple uses. We also recognize the importance of maintaining economically viable communities in our region. It is clear that Alternative C attempts to provide further support to the timber industry. We urge that this proposed increase in thinning be directly tied to diversification of plantation-origin pine. We also urge the CNFto work with industry leaders such as UPM-Blandin who are successfully marketing diverse species of trees grown on forestland specifically managed for natural, diverse forests.	See response 10-3  Alternative C was developed in response to issues that were identified during project scoping (see key issue #1 above).
10-5	LLBO 115 Sixth Street NW. Suite E, Cass Lake, MN 56633	2.2 Modifications from Scoping: For clarity, please explain here (or specifically reference later discussion of) the origin of Alternative C. Extending Table 2-3 to include Alternative C info would provide much clarity.	Alternative C responds to issues raised in Scoping letters 3, 4, 7 and meets Purpose and Need statement #4.  Table 2-3 identifies harvest treatments and stands dropped from the January 2010 proposed action. NEPA requires that such changes are disclosed. In moving through the NEPA process, the ID Team goes from a coarser to finer look. That is what these changes represent. We also found errors in our database and disclosed stands that did not conform to the Forest Plan

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			objectives/P&N, or were inadvertently reincorporated back into the database.
10-6	LLBO 115 Sixth Street NW. Suite E, Cass Lake, MN 56633	3.1.3 Direct and Indirect Effects;Two current issues: The discussion of EAB implies that phloem-reduction may still be considered by CNF as early intervention. This directly contradicts recent updates of research and recommendations presented at the Black Ash Workshop in Bemidji(May 2010). This excellent workshop was co-organized by Gary Swanson (CNF)and featured updates on EAB research by USFS scientists, including Steve Katovich and Kathleen Knight. While phloem-reduction is included in the SLAM protocol (Katovich2010), it is specifically NOT recommended as early intervention but rather as part of the SLAM emergency response to an actual EAB finding. An EAB research proposal currently under review on the CNF may improve our understanding of EAB and help address the issue of how best to manage forestlands in our region under its threat.	The discussion of EAB is a general discussion related to the health of hardwood stands in the project area. It is meant to inform the reader of health issues related to northern hardwood stands. This EA is not proposing to manage for EAB.  No contradiction is implied. The CNF as you indicate has embarked on EAB research in a separate study.
10-7	LLBO 115 Sixth Street NW. Suite E, Cass Lake, MN 56633	We urge continued collaboration with LLDRM, BWSR, MNDNR, TPI, TNC, MFRC, and other stakeholders to protect shallow lakes that can support wild rice and the waterfowl and aquatic mammals that rely on this habitat. Please include a statement in section 3.2 regarding the CNF commitment to identify and pursue opportunities to protect wild rice habitat on the CNF (Don Rees, lead CNF representative on such efforts).  3.3 Soils: Please include protection of wild rice habitat as a consideration when analyzing effects of soil disturbance.	We will continue appropriate collaborative activities in support of wild rice and waterfowl and aquatic mammals; however, this issue is being handled as a forestwide issue.
10-8	LLBO 115 Sixth Street NW. Suite E, Cass Lake, MN	We strongly urge you to consider including sugar maple, as well. Vigorous, healthy sugar maple forests have been highly valued by Ojibwe people for centuries. Many sugar bushes on the	Sugar maple is regularly considered through the analysis of Management Indicator Habitats (MIHs). The Northern Hardwoods community (which is dominated by sugar maple) was selected as an MIH in the Forest Plan. The Forest Plan contains specific

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	56633	CNF may be considered traditional cultural properties. However, the sustainability of this forest type in our region is seriously threatened by invasive earthworms, invasive plants such as garlic mustard, and changing climate. Hence the sugar maple forest type on the CNF warrants special protection now (Jim Barott and Tom Huette, lead CNF representatives on the earthworm problem). (Management Indicators (MI), Table 3-23)	objectives for the Northern Hardwood MIH by Landscape Ecosystem. While somewhat broader than sugar maple alone, the Northern Hardwood MIH addresses the plant community where sugar maple is usually found. MIHs were adopted in the Chippewa Forest Plan to more completely address habitat issues than would be addressed by MIS alone.
10-9	LLBO 115 Sixth Street NW, Suite E, Cass Lake, MN 56633	Environmental Consequences, MI Habitats, Effects (p71-78): While we appreciate the value of minor negative consequences over major ones, LLDRM cannot support negative trends in any CNF project away from meeting CNF Forest Plan Objectives to decrease young habitat and maintain old habitat (Tables 3-25, 3-27). Our concerns are supported by information provided under Cumulative Effects (p 73-77). Rather than asking if Moon significantly adds to forest-wide negative trends, we suggest that Moon and every project thereafter be used to overcome negative trends regarding young and old habitat. Each CNF project should strive to meet or exceed these Forest Plan Objectives. We do commend the Walker Ranger District on its record of meeting Forest Plan spatial objectives in recent projects (p76-77).	Annual monitoring of changes to forest vegetation age and type are reported in the Chippewa's Inventory and Monitoring Report. This report reflects forest-wide conditions and is the best place to determine how the Chippewa is progressing towards vegetation objectives. Trends at the project level do not necessarily translate into trends at the forest level.
10-10	LLBO 115 Sixth Street NW, Suite E, Cass Lake, MN 56633	Environmental Consequences, Effects (p 80-82): We remain concerned over forest management impacts on sensitive species. In particular, Alternative C would have the greatest impact of Moon Alternatives on sensitive bird species. If Alternative C is implemented, LLDRM will expect the CNF to fully apply mitigation measures related to sensitive species. In addition, we will urge the CNF to actively participate in current USGS/USF efforts to map, model, and predict forest conditions and forest bird impacts under changing climate ( <a href="http://www.umesc.usgs.gov/terrestrial/migratorbirds/birdconservation.html">http://www.umesc.usgs.gov/terrestrial/migratorbirds/birdconservation.html</a> ; Wayne E. Thogmartin,	Mitigation measures applied to certain forest stands or treatments in the Moon Project are mandatory. They will be fully applied.  While outside of the scope of the Moon Project, we will consider participating in the climate change project.  The research branch of the Forest Service is actively studying climate change. Information about the study is on the Forest Service's website.

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10-11	LLBO 115 Sixth Street NW. Suite E, Cass Lake, MN 56633	PhD:wthogmartin@usgs.gOv). 3.8, 3.9, &3.10 Tribal Interests, Environmental Justice, &Other Disclosures (p 95-103): LLDRM fully expects the implementation of the Moon Project to strictly adhere to comments and positions of the LLBOTHPO. Regarding watershed conditions, we commend and encourage the CNFin its partnering with LLDRM and other agencies on efforts to protect shallow lake/ wild rice/ waterfowl habitat. Regarding travel management, we commend CNFefforts to restore habitats fragmented or degraded by the extensive network of roads on the CNF. We appreciate the challenge of providing public access while protecting forest habitat. We request that the CNFcontinues to consult with ILBOMembers and LLDRM on road-specific issues so that tribal access is addressed. Regarding non-native invasive species (NNISs),we commend the CNFon renewed efforts to address NNISs;in particular, the forthcoming NNIS EA and current activities around earthworms, garlic mustard, and EAB. We welcome the proposed long-term focus on areas of high susceptibility. We urge perseverance and continued partnering with other agencies and stakeholders to develop, refine, implement, and enforce forest management practices aimed at reducing introduction and spread of NNISs into the forests, lake, and streams of our shared landscape.	The Forest will continue to consult with LICs and the DRM on road-specific issues.
10-12	LLBO 115 Sixth Street NW. Suite E, Cass Lake, MN 56633	Appendix C Response to Scoping Comments: LLDRM is encouraged by the success of the Walker Ranger District marketing single tree selection harvests (p C-5). We are especially pleased by the expressed acknowledgement of under-utilization of uneven-aged methods of harvest on the CNF(p C-5);the stated emphasis on managing for "the entire spectrum of wildlife habitats" (p C-7); and the full support offered to MNDNR's efforts to "protect or enhance shallow lakes and wild rice", protect rare resources such as the red-shouldered hawk (p C-	Natural origin pine stands were removed from the proposals. We will continue outreach, collaborative, and partnering efforts.

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		8),manage plantations to "create a more natural stand structure and increase species diversity" (p C-9),and adopt MFRCRiparian Guidelines as practice (p C-10). We generally agree with the Sierra Club's concerns and appreciate the CNF's thoughtful responses (p (-10 - C-14). We strongly oppose "regenerating" any stands of natural origin pine (p C-14) but believe these stands have been removed from such consideration. We appreciate your responses to our comments and look forward to continuing consultation, partnering, and inter-agency field trips (p C-15- C-18). Regardingroad issues, we commend your efforts to balance habitat protection with public access and encourage you to continue tribal outreach and partnering.	
11-1	MFI 903 Medical Arts Building 324 West Superior Street Duluth, Minnesota 55802	We support the implementation of Alternative C which recognizes the need to commercially thin additional red pine acres.	Additional red pine thinning supports Purpose and Need statement 4 and reflects a Key Issue.
11-2	MFI 903 Medical Arts Building 324 West Superior Street Duluth, Minnesota 55802	<p>MFI during the scoping process recommended that an alternative be developed that would increase final harvest acres, as well as, increase the commercial thinning of red pine plantations. Alternative C included additional thinning acres but failed to include final harvest acres that would move the forest closer to meeting forest plan young ageclass objectives.</p> <p>MFI's scoping comments revealed that proposed management actions failed to meet forest plan objectives for young forests by approximately 530 acres. No alternative reviewed increased final harvest acres. The rationale used by the District not to include additional final harvest acres was that" ... 0-9 age classes are not meant to be applied at the project level ... " (EA, C-3). The districts own</p>	<p>The comments and issues raised during scoping of the Proposed Action were reviewed by the interdisciplinary team. An action alternative (Alternative C) was developed to respond to the key issues described in Chapter 1. Alternatives considered in detail incorporate applicable laws, regulations and policies that govern land use on national forests; pertinent Forest Plan standards and guidelines designed to mitigate the potential adverse effects of the alternative treatments; and some or all of the purpose and need items identified in Chapter 1. The Moon EA alternatives evolved from the work of the interdisciplinary team using the best available science (See 40 CFR, 1502.9 (b), 1502.22, 1502.24). (EA, pg 15)</p> <p>All proposals, whether analyzed as an alternative or eliminated from further analysis, were reviewed in detail for meeting NFMA requirements, consistency with the Forest Plan and physical attributes such as access, basal area, stand size, slope which</p>

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		<p>analysis shows that the forest in most LE's has failed to meet young forest objectives. (EA, page 48-51).</p>	<p>affect harvest marketability. (EA, pg 15)</p> <p>A comment was received that contained an alternative which proposed final harvest of an additional 1,000 acres (resulting in an action alternative project size of 3,703 acres). Of the 1,000 acres submitted, 490 acres were added to Alternative C under the commercial thinning prescription. The remaining stands did not meet final harvest criteria. (EA, Table 2-6, pgs 24-25)</p> <p>The ID Team followed an interdisciplinary analysis (EA, pg 24-25) that resulted in the appropriate treatments when considering all issues and resources. The analysis showed we were meeting LE objectives for young age classes (EA, Table 2.5 and Project Record\1_Background Information\ MFI Briefing handout, 2010-01-19).</p> <p>The action alternatives create 1,268 acres in the 0-9 age class (plus a remaining 192 acres upland forest in existing, young, untreated stands for a total of 1,460 acres in the 0-9 age class (see EA, Table 3-4).</p> <p>The Decade 1 harvest treatment numbers projected in the Forest Plan are decadal projections not annual projections and are based on full funding and implementation of the Plan. Each environmental analysis (EA) and the set of harvest treatments resulting from that decision are based on meeting the vegetation objectives for the Landscape Ecosystem (LE) in which the project is being implemented. Vegetation objectives and existing conditions vary by LE, so we would expect some peaks and valleys in annual harvest treatment types, but over the decade meeting the vegetation objectives across a mix of project areas should yield harvest treatment similar to those projected in the Plan. The harvest methods displayed in Appendix D are estimates of the Proposed and Probable activities used to implement the Forest vegetation objectives. The Forest Plan states that: "The purpose of this appendix [D] is to display an estimate of the goods and services provided the proposed (decade 1) and probable (decade 2) management practices expected, and other information including land classification. As stated in Appendix D: "The outputs and proposed and probable practices listed are</p>

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			projections based on available inventory data and some are based on computer modeling. NOTE: The outputs and amounts are estimates and are subject to annual budgets for funding the various resource programs on the forest. Actual amounts may vary from these and will be monitored on an annual basis.” (Forest Plan, Appendix D Table App-D2, page D-3).
11-3	MFI 903 Medical Arts Building 324 West Superior Street Duluth, Minnesota 55802	MFI further contends that the district has failed to meet young forest objectives in every project proposed or implemented since forest plan implementation. If you do not meet the objectives at a project level the Chippewa National Forest will fail to meet these objectives at the forest wide level, as well.	Clearcutting is lower than Forest Plan projections. During Forest Plan revision it was recognized that there would be less regeneration in the initial years of Forest Plan implementation as the youngest vegetation age classes were over-represented in most LEs. Some of the recent planning projects recognize the need to create more acres in the 0-9 age class which would be reflected in the acres of clearcutting, coppice, or seedtree treatments. It takes about 5 or more years for acres that are planned to be harvested. (FY2008 M&E 2009, pg 23).
11-4	MFI 903 Medical Arts Building 324 West Superior Street Duluth, Minnesota 55802	At the project level, MFI recommended that approximately 400 acres of final harvest needed to be prescribed in order to meet the young forest plan objectives for these types. The EA proposes to harvest zero acres in lowland forest types, however. This is despite having survey completed for nearly 850 acres of lowland forest types prepared. MFI, again, recommends the Chippewa National Forest implement harvest in lowland forests in order to meet forest plan objectives.	Vegetative inventory is completed to gather information for a number of resources. In addition to identifying opportunities for harvest. It identifies such things as the existing vegetative condition. within-stand diversity and the need for rehab activities.  We do our best to treat the highest priority stands, while trying to achieve a balance of resource objectives, meeting NFMA requirements, consistency with the Forest Plan, and recognizing that many stands will be deferred and considered in our next entry. (EA, pg 15, 20).
11-5	MFI 903 Medical Arts Building 324 West Superior Street Duluth, Minnesota 55802	MFI disagrees with the assessment that single tree selection sales are marketable (EA, page C-3). The Chippewa National Forest sells its timber by grouping individual harvest sites together. Thus, purchasers bid on a suite of individual units. These units may include high production areas (clearcutting) as well as very low production areas (single tree selection). Operators are not being profitable on single tree harvest sites, but overall may still remain profitable across all sites harvested. The Chippewa needs to assess if the single tree harvests are meeting forest wide objectives (or limiting) and determine if other more operable silvicultural prescriptions could meet objectives for the site.	The Walker Ranger District has sold all its timber sales. The CNF is still under accomplishing uneven-aged harvests. Project decision under the 2004 Forest Plan (FY2005-FY2008) show 23% planned treatment acres. At this point, uneven-aged treatment acres are in line with the 26% projected for the end of the decade. (FY2008 M&E 2009, pg 24).

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11-6	MFI 903 Medical Arts Building 324 West Superior Street Duluth, Minnesota 55802	The EA describes shelterwood harvest on page 34 as an even-aged harvest that would set the stand back to the age of zero. True Shelterwood harvests are even-aged systems. These systems are prescribed through several harvests during the life of the stand, with a final removal of merchantable trees. We question whether the "shelterwood" system being implemented by the Chippewa National Forest is a shelterwood harvest. First, the harvest leaves a high level of basal area; in most cases less than 50 percent of the basal area would be removed. Clearly, setting these stands back to age zero and contending they provide the same habitat as young forests is highly questionable. Second, the prescription states that the remaining trees would be deferred until the next rotation. A "true" shelterwood harvest would treat the remaining trees within the same rotation as the existing stand. As prescribe by the Chippewa National Forest these prescriptions should not count towards meeting young forest objectives of the forest plan.	<p>The shelterwood described in the EA on page 34 is a shelterwood with reserves. This harvest, as defined in the Dictionary of Forestry; (Helm, John A. ,The Society of American Foresters. 1998.) retains the reserve trees for up to 1 rotation period for the purpose of providing shelter to the regenerating seedlings and in this case, helping to meet within-stand diversity goals for multiple resources.</p> <p>Clearcutting and Partial Cut 30 / Shelterwood treatments set the tree stand back to age zero, meeting the 0-9 year old age class objective for each landscape ecosystem (Forest Plan;Appendix D2-3)</p> <p>Shelterwood with reserves harvests regenerate stands while retaining overstory basal area. Overstory trees would be retained after regeneration to meet multiple resource objectives (e.g., visual concerns, wildlife values, Riparian Emphasis Management Area objectives). In some stands, existing natural regeneration (e.g., hardwoods, balsam fir) would be released via harvest operations. (EA, pg 21-22)</p>
12	MTPA 903 Medical Arts Building 324 West Superior Street Duluth, Minnesota 55802	See comments from letter 11. This letter is identical to letter 11.	See responses to letter 11.