

Sent by: Diane T Walker/R9/USDAFS

cc  
bcc

10/26/2010 09:07 AM

Subject Fw: KBB / Savanna Ecosystem Recovery Plan

----- Forwarded by Diane T Walker/R9/USDAFS on 10/26/2010 09:06 AM -----



"Ed Fisher"  
<efisher@gtlakes.com>

10/24/2010 11:37 AM

To <comments-eastern-huron-manistee-baldwin-white-cloud@fs.fed.us>

cc

Subject KBB / Savanna Ecosystem Recovery Plan

Attn:

Christopher Frederick

Baldwin-White Cloud Ranger District

650 N. Michigan Ave.

Baldwin, MI. 49304

### Karner Blue Butterfly

28A I am opposed to alternatives two and three of this project, and honestly, against the entire package of information I received regarding this project.

28B The information packet is full of information that contradicts itself. For example: follow up on the information regarding the campsites located in the Pines Point area. There are four different pages that describe the acreage of the impacted area in as many different sizes. If this area can not be defined accurately, then how can we be sure that the rest of the information contained in this document is accurate?

28C The herbicide that is proposed for use on this project is formally known as "Round Up". This is a chemical that's use was banned in Canada. Although a dollar amount was determined for the use of this product, no amounts of gallons was listed. The dollar amount could be converted into hundreds if not thousands of gallons.

28C Hundreds or thousands of gallons of "Round Up dumped in the Pines Point area would have devastating effects on not only trees and plants, but would effect the smallest of insects to the largest mammals, and all of our aquatic species. It's documented that "Round Up" causes low birth rates, birth defects and deformities, and even death. This is not the product I want used anywhere near my home and family, do you?

28D I could go on; however, I will stop here leaving you with one final thought. By your own admittance, this

28D

project was implemented in Newago, and failed. Failed! At what cost did this project fail? Two point nine million is roughly the cost of this project. Is this the way we want to spend our money... on failed projects? Don't just look at the money; look at the plants, trees, animals small and large, and the people. People like myself who enjoy the area just how it is.

Ed Fisher

6622 S.142nd Ave

Rothbury, MI. 49452

P.S.; I would also like to receive the "SOPA" Schedule of Proposed Actions.

Return receipt requested.

comments-eastern-huron-manistee-baldwin-white-cloud  
Sent by: Diane T Walker/R9/USDAFS

To Christopher J Frederick/R9/USDAFS@FSNOTES, Leslie E Russell/R9/USDAFS@FSNOTES

cc

bcc

10/22/2010 11:05 AM

Subject Fw: Comments Karner Blue Butterfly

Chris,

You may want to respond and let her know that we are not proposing to treat 26,000 acres.

----- Forwarded by Diane T Walker/R9/USDAFS on 10/22/2010 11:05 AM -----



"hrapp"  
<hrapp1924@gmail.com>

10/20/2010 05:31 PM

To <comments-eastern-huron-manistee-baldwin-white-cloud@fs.fed.us>

cc

Subject Comments Karner Blue Butterfly

Baldwin-White Cloud Ranger District  
650 North Michigan Ave.  
Baldwin, Michigan, 49304

Attn: Christopher Frederick

From: Linda Fisher

Address: 6622 S. 142<sup>nd</sup>. Ave., Rothbury, Mi. 49452  
Phone: 231-861-2681

Date: October 20, 2010

Dear Mr. Frederick,

If my understanding is correct, the Savanna Ecosystem Restoration Project means too:

- 29A — 1. Clear out 26,000 acres of forest. (Which is a habitat for thousands, if not millions of birds, mammals, insects, ect.)
- 29B — 2. Spray so-called safe herbicides (Roundup already pulled off shelves in Canada....causes premature births). Will contaminate air, ground, water, wildlife, fish and PEOPLE!!!
- 29C — 3. Spend over 2.9 million of US money. (US economy already going under).

My opinion:

Waste of US dollars, to do more harm than good!

29D

I vote NO!!! To the Savanna Ecosystem Restoration Karner Blue Butterfly Project.

Thank you,

Linda Fisher

PS. I would like to receive a "Decision Notice".

In addition, I would also like to receive the SOPA, (Schedule of Proposed Actions) by mail.

:

October 15, 2010  
To Whom It May Concern,

30A

The purpose of this letter is to voice my opposition to the past and present practices that have already occurred and those currently being proposed. The Savanna Ecosystem Restoration Project in its assessment and implementation is a failure.

30B

I have traveled the areas in question with both a vehicle and a snowmobile. The roads I have traveled every year for the last 44 years have been as well as that as my family for recreation. Driving on those two tracks has enabled me to recreate and enjoy our open public land.

30C

The funding for you project should be eliminated in these economic times and be diverted to form jobs for our residents. Michigan is the hardest hit state and the dollars you are expending should be used for our area for job creation.

30D

The butterfly and bat projects are an economic failure. The destruction of trees, controlled burning of forest and prevention of use of trails in our National Forest for hunting, recreation, fishing, camping and having access to those by motorized vehicle is a travesty.

30E

Take your project to a different location. We as Oceana County property owners do not want it. Your last survey encompassing out of state and out of county people should not have been factored when looking at our local impact and how your project negatively impacts our location.

30F

30G

The areas I travel monthly are Sections 1 and 12, T11-12N, R17W, Montague-Whitehall Township, and Muskegon County Michigan  
Sections 2-10, 16-18, 19 20, 29 and 30, T13N, R15W, Greenwood Township, and Oceana County Michigan.  
Sections 1-5, 9-16, 19-36, T13N, R16W, Otto Township, Oceana County Michigan  
Sections 36, T13N, R17W, Grant Township, Oceana County Michigan.

I am traveling roads and all two tracks currently for bow and will be for the firearm and muzzle loading deer season.

30H

It is ironic that you have targeted Oceana County on your list. We have some of the poorest residents located in our area of the State of Michigan. This infers to me of wage discrimination. Plus if your project proceeds to fruition it is age discrimination because those of a mature age simply do not have the stamina to walk where they used to drive a vehicle.

30I

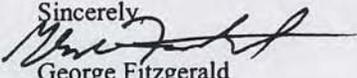
I suggest to you that the data you receive must only be used by those who are directly affected. The taxpayers of the area you're trying to control should have full precedence.

30J

As this project proceeds into probable litigation, discovery, and due process the community that makes up the area in question must be represented.

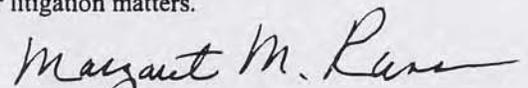
Hopefully, a proper legal remedy will assist us in the last affected areas may have to be retrofitted to revert back to what was before your environmental interventions.

Sincerely



George Fitzgerald  
43377 Rivergate Dr  
Clinton Twp MI 48038  
586-295-7583

Please provide me with the following information under the Freedom of Information Act: The Amount of Dollars your organization has allocated of tax payers or private dollars for litigation matters.



MARGARET M. RAMA  
Notary Public, State of Michigan, County of Macomb  
My Commission Expires September 8, 2014  
Acting in the County of Macomb

October 19, 2010

Dear Sirs/Madams,

31A

I am writing to voice my displeasure of the Savannah Project planned for Oceana County. I am totally against destroying a community that relies on the area to not only live, but to play and relax. There is no reason for trail closures and tree destruction in order to save the Karner Blue butterfly. How did the butterfly become endangered? What is its natural enemy?

31B

31C

I have traveled those roads and trails for many years by snowmobile and 4x4 vehicles along with the family. I want our children to be able to enjoy those trails the same way for many years.

31B

I have read the "book" of info that was sent regarding the closings and maps and the poor excuse for needing to cut trees and close beautiful natural trails, but not how they became endangered or their predators.

That said, I am requesting the following information:

31D

All names of those individuals responsible for the inception of this project e.g. the person(s) in charge, those who worked on map locations and trail closings-any individual directly working on the project.

Where the funds for the project are coming from as well as the cost.

Please also forward all responses you have received from people who were mailed the questionnaire a few months ago. Along with responses, send the names, addresses and phone numbers of respondents.

31E

The area of Oceana County is one of the poorest counties in Michigan. This project will do nothing to help those citizens in fact it will hinder those who have small businesses that rely on tourism to survive.

Please provide this information as soon as possible as this is a Freedom of Information Act request.

Sincerely,

*Julie Fitzgerald*  
Julie Fitzgerald

43377 Rivergate Dr.  
Clinton Twp, MI 48038  
(586) 228-1401

comments-eastern-huron-manistee-baldwin-white-cloud  
Sent by: Diane T Walker/R9/USDAFS

10/24/2010 08:02 AM

To Christopher J Frederick/R9/USDAFS@FSNOTES, Leslie E Russell/R9/USDAFS@FSNOTES

cc

bcc

Subject Fw: Karner Blue vs trees

----- Forwarded by Diane T Walker/R9/USDAFS on 10/24/2010 08:02 AM -----



"V. Arlene Frodey"  
<RAYFRODEY@comcast.net>  
>

10/23/2010 10:02 AM

To comments-eastern-huron-manistee-baldwin-white-cloud@fs.ed.us

cc

Subject Karner Blue vs trees

My husband and I have been nature photographers for many years. He has specialized in butterfly, dragonflies and moths and has an extensive collection of photographs of each category. We both have been concerned about the survival of the Karner Blue. However, I also like trees a lot and it pains me every time I see a big old tree, which has taken so many years to get to the size it is, cut down for whatever reason.

32A — Planting lots more lupine is a great idea. We have been planting lupine in our gardens and they have been multiplying over the years. We have planted to encourage other butterflies and other wildlife also, because we enjoy seeing them. The butterflies and dragonflies seem to be fewer every year. The roadside spraying has killed the larva of many species and spraying for weeds in the lakes is killing the larva of the dragonflies.

So I've been thinking about the dilemma of clear cutting a path for the Karner Blue. I've tried to look at it from the sportsman's point of view. There are plenty of other wooded paths they can enjoy. It seems like the clear area will eventually grow back, but once the beautiful little Karner Blue is extinct it will not come back and I believe that is symbolic of we humans misplaced loyalties and caring.

Lets save the Karner Blue!

Sincerely,  
Arlene Frodey

comments-eastern-huron-manistee-baldwin-white-cloud

Sent by: Diane T Walker/R9/USDAFS

10/18/2010 10:14 AM

To Christopher J Frederick/R9/USDAFS@FSNOTES, Leslie E Russell/R9/USDAFS@FSNOTES

cc

bcc

Subject Comment on the Savanna Ecosystem Project

--- Forwarded by Diane T Walker/R9/USDAFS on 10/18/2010 10:14 AM ---



ron g <reg032@hotmail.com>

10/15/2010 09:52 AM

To <comments-eastern-huron-manistee-baldwin-white-cloud@fs.fed.us>

cc

Subject

33A

Of all the things you could do to improve the public land by the white river this is what you come up with really? . I have hunted and fished this area for twenty years and now i have to give up the use of a large portion of PUBLIC land for a butterfly this is worse than stupid. In a time when our government has to print more money so they have some you are going to commit to a long term expensive project that reduces access to hunting land and the river. This is a horrible idea not to mention misleading most of the land you plan on shutting down and turining into an artificial ecosystem for butterflies is outside of the pines point area to the west.

Ronald E. Gafford

Leslie E Russell/R9/USDAFS

10/26/2010 12:55 PM

To Christopher J Frederick/R9/USDAFS@FSNOTES

cc

bcc

Subject Fw: WWW Mail: new prarie

----- Forwarded by Leslie E Russell/R9/USDAFS on 10/26/2010 12:43 PM -----

**r9 hmnf website**

Sent by: Carol  
Nilsson/R9/USDAFS

10/26/2010 12:06 PM

To Leslie E Russell/R9/USDAFS@FSNOTES, Heather  
Keough/R9/USDAFS@FSNOTES

cc Carol Nilsson/R9/USDAFS@FSNOTES

Subject Fw: WWW Mail: new prarie

FYI

----- Forwarded by Carol Nilsson/R9/USDAFS on 10/26/2010 12:05 PM -----



**www.marjorie.gilde@gmail.co**

m

10/22/2010 10:25 PM

To r9\_hmnf\_website@fs.fed.us

cc

Subject WWW Mail: new prarie

34A — I was alerted by a family member concerning the destruction of future forest acreage to install a prarie for the Karnal blue butterfly. I am all for creating praries for endangered species, and it will create habitat for many grassland species such as the bobolink and meadowlark. However, I am against cutting down precious forest habitat to do so. We are creating one habitat at the expense of another. Many of our neotropicals need large forest tracts to have a successful breeding season. What about all of the species that already live in the targeted forest area? I feel that because our wildlife is being squeezed into smaller and smaller areas for habitat that when one is focused on a goal, such as creating a prairie all of the consequences must be considered. How about contacting the Natural Land Conservancy and as a team work together to aquire land such as farmland to create your prarie. The land is already cleared and it doesn't impact other wildlife as much. In this situation, it will inhance the land.

comments-eastern-huron-manistee-baldwin-white-cloud

Sent by: Diane T Walker/R9/USDAFS

10/18/2010 09:50 AM

To Christopher J Frederick/R9/USDAFS@FSNOTES

cc

bcc

Subject Fw: karner butterfly

----- Forwarded by Diane T Walker/R9/USDAFS on 10/18/2010 09:49 AM -----



**gould robert**  
<bg\_32363@hotmail.com>

10/16/2010 02:01 PM

To <comments-eastern-huron-manistee-baldwin-white-cloud@fs.fed.us>

cc

Subject karner butterfly

35A — Helping the butterfly -- fine. Closing the forest roads -- very bad. Over the last 30 years I have witnessed the closing of a large amount of forest roads. Basically you are limiting the access to our public lands to only those capable of hiking miles to get to where they want to be, or private land owners who happen to own property behind areas you have closed off. The area along the North Branch of the White river has always been open to hunters and fisherman who have used these areas for most of their lives, to now cut off their access is just wrong. The river is one of the best trout and steelhead streams in Michigan. There is currently many forest roads that allow us to get somewhat close to the river. If you close these roads you might as well close the river to fishing because we will not be able to get near it. Wouldn't it be possible to keep the roads open and still create the butterfly savannah. I have also noticed that you have closed and or reduced the majority of small camping sites along the Baldwin, PM, Pine and Little Manistee rivers. These sites were wonderful for family's to camp for a couple of days. Now it's gone. What's next? 35B — Would it help if you just moved all of us out of Michigan so that you could restore it to what you think it should be. I am betting that a 150 years ago this state was mostly a huge white pine forest with very few savannahs. Savannahs probably came about because man nearly logged off every tree in this state, maybe that's how the Karner came to live here. Are we the people not allowed to enjoy the public lands? 35C — Are they to be used only by a select few? Please let be able to enjoy the outdoors for what time I have left. 35D —

*Thank You,*  
**Robert Gould**  
[bg\\_32363@hotmail.com](mailto:bg_32363@hotmail.com)

comments-eastern-huron-manistee-baldwin-white-cloud

Sent by: Diane T Walker/R9/USDAFS

10/18/2010 10:12 AM

To Christopher J Frederick/R9/USDAFS@FSNOTES, Leslie E Russell/R9/USDAFS@FSNOTES

cc

bcc

Subject Fw: Karner Blue habitat

----- Forwarded by Diane T Walker/R9/USDAFS on 10/18/2010 10:12 AM -----



<jerry@jerrygrady.com>

10/15/2010 10:05 AM

To comments-eastern-huron-manistee-baldwin-white-cloud@fs.ed.us

cc ;hausman@muskegonchronicle.com

Subject Karner Blue habitat

36A

Although I support the effort to increase habitat appropriate for the Karner blue butterfly, I think the announcement was carried out in the clumsiest manner possible. The message the public hears is that 3500 acres of forest is going to be clear cut to make room for one little blue butterfly species. No one "hears" ten years. It is as if the U.S. Forest Service designed the project and its announcement with the intent to guarantee enthusiastic opposition. Perhaps this is the goal of the Forest service in an attempt to get the conservationists off their agenda by generating unfavorable public pressure. If this isn't the case then the U.S. Forest Service employees who are involved in the project design and the manner of the announcement are tragically naïve and should consider alternative career choices.

36B

Jerry

10/18/2010 10:00 AM

Subject Fw: opinion on Karner habitat

----- Forwarded by Diane T Walker/R9/USDAFS on 10/18/2010 09:59 AM -----



"Scott Greiner"  
<sgreiner@andersonglobal.com>

To <comments-eastern-huron-manistee-baldwin-white-cloud@fs.fed.us>

10/15/2010 05:10 PM

cc

Subject opinion on Karner habitat

37A - I can not believe that the closing down of a portion of the Manistee National forest is being considered to develop a Karner blue habitat. What is the logic of destroying the existing habitat that is inhabited by a variety of species currently for the preservation of one species? Surely if the need is to have a cleared area for planting vegetation to accommodate this type of butterfly there are areas open areas throughout the forest or even outside it were small sections can be planted WITHOUT THE REMOVAL of the existing forest.

37B -

37C - Also, why is it that the US forestry continually closes down more & more areas within the national forest? Within the Manistee national forest near Crystal Valley a number of trails have been closed down in the past couple of years.

37A - My confusion is, everyone wants to reduce crime, find better outlets for children, encourage children to be outside and active, and at the very same time we limit the outlets available by going ahead with actions like the proposed habitat. I relieve not everyone is a hunter or a fisher, but not everyone is a football player or a volleyball player either. Plans such as this one can not be allowed to go through for the sake of all those families who find their hobbies in the great outdoors. This time it is for butterflies soon it will be something else.

37D - Another factor is looking at it from a state financial aspect. The price of licenses for hunting & fishing keep rising to cover the slumping economy, budget & the overall lower number of sportsmen. Things like this only further contribute to people no longer buying licenses since they no longer can access the land they depend on.

--Scott Greiner (a concerned citizen)

38A

This is to late, but I was told to write anyway, in connection to the Savanna Ecosystem Restoration Project. I recieved all your ideas on what is to be done. I disagree with all of them for these reasons.

38B

1. We are losing our rights to the use of our land. I agree with the stopping the use of the quads and trail bikes because of the way they are used. To me, this is our land to use for recreation, hunting, fishing, camping, hiking and limited horse-back riding. In a way, we pay taxes on the land, we should have the use of it.

38C

2. Horse-back riding, they tear up the roads just about as much as RV's do. They og through the woods during hunting season. They slould have to stick to certain roads like we do. If the road is blocked off, they can't use it either

38D

3. Controlled burns. You are planning more burns in the area where I do a lot of hunting. The last controlled burn wasn't too controlled, because it got away from you and burnt a bigger area than planned. In doing these burns, you are also ruining deer habitat and hiding places. It usually takes at least 1 year for deer to come back to that area. All this for a butterfly that will survive either way with all the other places that use the same excuse. That's all it is!

38E

4. Roads. I don't unserstand why all of the roads had to be blocked off. If a fire breaks out, fire trucks can't get in to fight them and the fire burns more than it should. Only because you can't get to it. Then we have forest fires like the other states where it burns thousands of acres. Now that the bridge is out on 152nd. Ave. the first 2-track on

38F

160th St. going west should be opened again to give people that own property on the east side of the N. branch of the White River can have easy access to their property.

38G

5. I have a handicapped license plate and have difficulty walking long distances. I can't go up to Pines Point and walk down to the White River at the end of 160th St. where I liked to fish because the road is cut off. Nothing you have planned pertains to the handicapped people and there is a lot of us that try to go up there for recreational purposes.

38H

6. Cutting pines. If any pine trees are cut out, they should have to be replaced with more pine trees. This is Pines Point! You do not need to make camp sites where pine trees have to be cut down to make room for them. This is called destroying public property. Our Property!!

Arthur L. Griswold  
1841 Hilt Rd.

*Arthur L. Griswold*

Muskegon, MI 49445  
231-709-8167 (Home)  
231-672-1381 (cell)

comments-eastern-huron-manistee-baldwin-white-cloud

Sent by: Diane T Walker/R9/USDAFS

10/22/2010 11:03 AM

To Christopher J Frederick/R9/USDAFS@FSNOTES, Leslie E Russell/R9/USDAFS@FSNOTES

cc

bcc

Subject Fw: KBB/Savanna Creation Project

----- Forwarded by Diane T Walker/R9/USDAFS on 10/22/2010 11:03 AM -----

Elduapent@aol.com

10/20/2010 08:39 PM

To comments-eastern-huron-manistee-baldwin-white-cloud@fs.ed.us

cc

Subject KBB/Savanna Creation Project



Christopher Frederick  
Baldwin-White Cloud Ranger District

Dear Ranger Frederick,

We are stewards of this planet. We need to protect the Karner Blue Butterfly from becoming extinct. The original intent of designating our public lands was to preserve the beauty of nature for future generations.

There is always ANOTHER PLACE to fish, hunt, ride your horse, etc. I am sure other places to do these activities can be found in the Manistee National Forest.

39A - But once the Karner Blue is gone, it is gone forever.

The Manistee National Forest belongs to ALL of us, not just the special interest hunters, riders, fishermen, etc.

I live in Pentwater, Michigan. I ASSUME you are accepting comments from ALL Michigan residents and beyond, since this is a NATIONAL forest and it belongs to ALL of us.

I demand you protect the Karner Blue.

Thank you for your consideration.

Ellen Sue Hamburger  
5951 W. Duna Vista Dr.



October 25, 2010

In regards to: Savanna Ecosystem Restoration Project

Mr. Christopher Frederick, IDT Leader  
Huron-Manistee National Forest  
Baldwin-White Cloud Ranger District  
650 N. Michigan Ave.  
Baldwin, MI 49304

Dear Mr. Frederick,

40A

I recommend that you select Alternative 1 for the following reasons.

40B

- The Environmental Assessment clearly states that negative impacts are likely to occur. While the proposal lists methods to minimize any negative impacts, they are still, in fact, negative impacts. All three alternatives are "Likely to Adversely Affect" the Karner Blue Butterfly. If a plan that will cost an initial investment of \$2,983,050 will adversely affect the butterfly, it is not only foolish to attempt but fiscally reckless. I believe that further study of the current KBB projects (EA 3-5, 6) (EA 3-39) is called for.

40C

- Lupine grows in open areas from disturbed soils. Closing more than half the trails used by motorized vehicles will actually be counterproductive to the growth of lupine.

40D

- The surveys conducted of the Karner Blue may not be accurate. Surveys in this area have been conducted at post-peak times during the life span of the KBB.

40E

- Although the plan seeks to promote the habitat of the Karner Blue Butterfly and the Indiana Bat, it does not consider the negative effects on other endangered or threatened species. One species in particular that comes to mind is the Black Rat Snake. "Alternative 1 is expected to have primarily beneficial direct and indirect effects on wildlife associated with mid- to late-successional forest habitats, and any adverse direct and indirect effects are expected to be minimal" (EA 3-89).

40F

- Existing road and camping facilities have had a positive financial impact on surrounding communities for decades with an investment by the NFS of zero dollars. This project proposes to eliminate historic uses, historic roads and historic camp sites in favor of a project with an unknown success rate at a cost of \$2,983,050.

40G

If the project fails, the cost of re-creating the existing condition would be devastating. The Project Area currently consists of only 635 acres of suitable area for habitat creation. The remaining 2315 acres are primarily forested with 120 year old trees well suited to this type of area (EA 1-3) that were planted from the 1890s to the 1920s (EA 1-10). The Forest Service estimates that creation of a Savanna can take as little as ten years (EA 1-10) while the restoration of the current forest type, should the project fail, would take no less than 120 years. This is not a project that can be 'undone' easily. If the area were to be returned to the commercial timber base it would take longer than our lifetimes, our children's lifetimes and quite possibly longer than our grandchildren's lifetimes to get back to the current state the area is in now.

40H

- On the Manistee National Forest the White River area is allocated to Management Area (MA) 6.1, Semi-Primitive Non-Motorized (SPNM) (Forest Plan at III-6.1-3, Table III-8). The desired future condition, in relevant part, is to emphasize non-motorized use (Forest Plan at III-6.1-4). The desired future condition for the three areas listed above is not practicable as this area has historically been utilized heavily by motorized recreation. The Forest Service estimates that nearly 1.5 million residents

40H

participate in OHV recreation in Michigan. *Off-Highway Vehicle Recreation in the United States, Regions and States: A National Report from the National Survey on Recreation and the Environment (NSRE)*, June, 2005. H. Ken Cordell at page 15. Table 6. It is arbitrary and capricious for the agency to attempt to mold these areas into a non-motorized desired future condition when failing to consider the current OHV demand, future demand, and the current situation of these areas utilized heavily by motorized recreation. This classification was not open to public comment at the time of designation. Redesignation was not opened up during Forest Plan Revision process as stated (EA 2-9).

40I

- It is improper to close roads as a part of this Project because of their proximity to Endanger Species habitat. Section 9 of the ESA makes it unlawful for anyone to "take" an endangered species. 16U.S.C. § 1538(a) (1). "Take" is defined as to "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." 16 U.S.C. §1532(19). The United States Department of Interior has further defined the statutory term of "harm" to be an act which actually kills or injures wildlife. See 50 C.F.R. § 17.3. In upholding this definition, the Supreme Court has stated that "the government cannot enforce the Section 9 prohibition [against a take] until an animal has actually been killed or injured." *Babbitt v. Sweet Home Chapter of Comm. For a Greater Oregon*, 515 U.S. 687, 703 (1995). Harm must be "actual" not potential or merely speculative. *Arizona Cattle Growers' Association v. United States Fish and Wildlife Service*, 273 F.3d 1229, 1239 (9th Cir. 2001); *National Federation v. Burlington Northern Railroad, Inc.*, 23 F.3d 1508, 1512 (9th Cir. 1994); *American Bald Eagle v. Bhatti*, 9 F.3d 163, 166 (1st Cir. 1993). Even where there is compelling science, without evidence of causation of actual injury or death of a take, enforcement of section 9 of the ESA is unlawful. See *Defender of Wildlife v. Bernal*, 204 F.3d 920 (9th Cir. 2000) (Despite some solid factual premises and well founded expert opinion plaintiff's theory, that construction of a school complex was in an areas known to be a habitat of an endangered species, was only speculative and not sufficient to support an injunction.). "Mere anecdotal plover/vehicle interactions of record do not present a principled basis from which to discern a reasonable likelihood that the vehicle traffic at issue will result in actual death or injury to the plovers allegedly present ... ." *Atlantic Green Sea Turtle, et al. v. County Council of Volusia et al*, 2005WL 1227305 at \*6 (M.D. Fl. 2005). As in the Country Council of Volusia case, no evidence is present in the Forest Plan, FEIS, or ROD to support a guideline prohibiting motor vehicles in essential habitats for endangered, threatened, and sensitive species. Forest Plan at II-13. Section 7(a) (2) of the ESA imposes a duty upon federal agencies to avoid destruction or adverse modification of habitat of endangered species where such habitat is determined to be critical.<sup>1</sup> Section 7 provides for the issuance of an Incidental Take Statement ("ITS") where there is specific evidence that the proposed activity will lead to a "take."<sup>2</sup> A take is limited to "significant habitat modification or degradation" that "actually kills or injures wildlife by significantly imparting essential behavior patterns, including breeding, feeding, or sheltering." See 50 C.F.R. § 17.3. Speculative or potential impacts to habitat are not sufficient to impose restrictions or conditions on land use. Evidence of a "take" must exist.

Potential impacts of recreational uses of the forests are not enough to constitute a "take" under the ESA. Therefore, the guideline 2200 VIII (D) (4) is overreaching and exceeds the requirements of the ESA. As discussed above, and confirmed by the Supreme Court, an agency may not proscribe activities, such as motor vehicle use, in order to protect habitat that is merely considered essential. *Sweet Home*, 515 at 708-14 (O'Conner, J., concurring); see also *Arizona Cattle Growers*, 273 F.3d at 1244 ("[T]here is no evidence that Congress intended to allow the Fish and Wildlife Service [though the ESA] to regulate any parcel of land that is merely capable of supporting a protected species.").

The Environmental Assessment provides no concrete evidence that a "take" has occurred due to recreation use, nor has the EA provided any reasonable certainty of a "take." Guidelines prohibiting motor vehicle use in essential habitat would be arbitrary and capricious and exceed the requirements of the ESA.

November 10, 2010

40J



We would like to urge the Responsible Official to select Alternative 1 for the above reasons.

Sincerely,

Patrick J. Brower  
Chairman, Land Use Committee  
Great Lakes Four Wheel Drive Association

Date: October 19, 2010

By: Christine Hubert  
8277 W. Adams  
Hesperia, MI 49421  
Phone no. 231-854-0132

Submitting Comments on the Savanna Restoration Project – EA

To: Christopher Frederick  
Leslie Russell  
USDA Forest Service  
650 N. Michigan Ave.  
Baldwin, MI 49304

Thank you for sending information on the Savanna Ecosystem Restoration Project.

41A

First, I would ask that you make this document part of the official record in response to the EA and the proposed project.

41B

I would like to give you some of the history of my, and other's, horseback riding in this area and around the country on Public lands. Included are some comments on the 'studies' used to develop this project. There are also suggestions I hope you will seriously consider for changes in your Forest Plan that might make the public less likely to be so anti-government towards this 'plan to kick everyone out of their favorite hunting, horseback riding and firewood gathering area just for the sake of a few butterflies and some bats.

If it sounds like I am opposed to this project, you can be assured that I am, especially when it means fewer trails to ride on. However I will still offer suggestions.

#### **Historical Information About Horseback Riding on the HMNF**

I have lived in Muskegon, Oceana and Newaygo counties all of my 55 years and I have been riding horses for 49 years and hope to be riding for another 50 years.

In 1998 I rode solo mostly USFS roads and trails when I rode by horseback through Michigan, the U.P, Wisconsin (near Ino, WI where I observed a savanna project which looked like a nuclear bomb had wiped out everything but a few tall trees) on through Minnesota, via the North Country Trail and then all on roads through North Dakota and South Dakota to the Black Hills back. In the Black Hills, most of the USFS roads were fitted with cattle guards and the access gates beside them were locked with padlocks at a time when Forest Lands there were open to horseback riding. The local Ranger even gave me the map of the area to ride. He failed to inform me that I would have to jump my horse off a cliff to access the trails because the roads were gated.

41C

I have ridden solo from Hesperia to Muskegon on my horse (2008). I have ridden from Holton to Cadillac passing through the Brohman area(1991), Hesperia to South Dakota (1998), Hesperia to Cadillac (2009), Hesperia to Northeast Ohio (2008), White Cloud to Charlotte, MI (2009) Charlotte to Missouri (2009) All Rail Trails were basically closed to horses Some were touted as being open but you had to ride on ballast (sharp stones) and so it really was not safe for horses. That trick is played on horse people a lot these days-calling it open and then closing off easy access to actually discourage horse use. So I had to ride the roads, some with no shoulder to ride on and where idiot driver fail to give the right of way to slower traffic which include bicycles, horse driven

41C vehicles and horseback riders. Let me tell you it gets your heart racing when you hear a pick-up truck coming up behind you close and there is no traffic coming from the other way, the driver refuses to give you more room and brushes your knee with his truck mirror. This was not a case of NOT seeing a horse back rider. I rode a white horse and was wearing a Neon Yellow Safety jacket. And it was the middle of the day on a paved county road.

41D I do understand that 'RailTrails' are State lands and not Federal and not your concern, but I mention the non-access for horses in order to point out that we are losing safe places to ride at an accelerated rate and there is a growing concern from horsemen and trail riders in particular of soon having no place to ride our horses where there are no motor vehicles.

I rode to Missouri along roads because USFS has started to charge Recreational Pass fees as high as \$50 to ride the forest trails through certain areas. Well, so much for seeing our beautiful public lands from the back of a horse unless you are well off financially. Why do I ride a horse every where? I have a problem falling asleep while driving, it is too hypnotic. So I ride. I also have a bad knee which means I cannot walk on uneven roads or trails.

41E Hiking groups and environmentalists have played a major role in kicking horses off trails. There would not be an Appalachian Trail for hikers to enjoy if not for the Indians and horses. It is now closed to horses. Now, the North Country National Scenic Hiking Trail has been closed to horses when, at the time it was being promoted, it was supposed to be open to horse use. Horses kept the trail open for hikers. What a wonderful adventure for someone to ride across the country on! In the early 1970's at age 16 this was my dream. That opportunity is now gone for future generations, too. Even the recently opened American Discovery Trail across America - open to horses - is mostly on the motor vehicle roads and not horse friendly.

41F We have some of the best areas for horseback riding in the state of Michigan right here in the 3 county area affected by the KBB/Savanna Ecosystem Restoration plan. And now we see the plan for horseback riders to get kicked out of more areas at an increasing rate. All because of a law that was passed to protect elephants, tigers and other exotics, not defective butterflies, spotted owls or snail darters at the expense of others using public lands.

In the 1940's the Videtich family ran cattle in the area of what is now commonly known as Pines Point. I have not seen pictures of the habitat at that time but have seen photos of the family members rounding up cattle on horseback.

41G I have been riding horses in the Pines Point and adjacent areas since 1973. I have ridden there a number of years on Jan 1st when snow levels are low or non-existent. I have also ridden there when snow was belly deep on the horses and fluffy as feathers. It was a beautiful and quiet experience. I'm sure we did not destroy any butterfly in any stage of development while riding on the established trails and roads during any season we rode.

41H September, October and early November are the best times to ride in Muskegon, Newaygo and Oceana counties. However, your project has designated this the time to do the majority of the work. No horseback riding would be allowed at this time and the deer will be too contaminated to eat so why hunt here either. Exactly what is your agenda?

41I In the last few years, it has been suggested, by USFS personnel to horsemen, to camp on the edge of the roads where there are openings to park off the road. There were so many roads gated off in the past couple of years and I suppose it could have been done so you could more easily study the effects of horse manure to see if you could find any reason to kick horses out of the forest. There probably were some lupine

41I - growing there too and likely someone also wanted to 'prove' that horses were damaging butterfly habitat. Well, who wants to camp on the side of the road where every vehicle that drives by throws dust on your camp kitchen and the food you are eating?

41J - I was riding in the Pines Point area on the two-track beside Knapp Lake, when there were three bodies of water there many years ago. Now I carry a water pail to water at the spring on the south end of the 'lake'. Have done this for years. Thank you for digging the ditch along the east side of the **old, dried up lake bed** by the way. I have not ridden Pines point in 2009 since I rode to Missouri. Are you planning to dig out the lake bed and restore it to a water-filled body of water or have you already done this? You imply that horses are stepping in 'Knapp Lake' (page 3-166) when there was/is actually no lake there at all and it was impossible to do so. But, I don't see the lake returning just because you cut down all the trees so they are not sucking up the water.

41K - In the early 1990's, I volunteered to travel by horseback and map all the trails in the Greenwood and Otto Township areas for the US Forest Service that were navigable by horseback. The maps I made of the area were turned in to the White Cloud Ranger Station. It included over 134 miles of, open and available to horse travel, county and forest roads and two-tracks in those townships including two single-track trails. I found and included on the map the old single-track Owassippe Boy Scout trail on the east side of the White River [marked with yellow Fleur-de-lis emblems on the trees] as well as the **marked Silver Diamond Mikkelson Trail, now commonly known as the 'River Trail'**, which is used mainly by horseback riders and mountain bikers today and located in the Pines Point Recreation Area along the White.

41L - In your report on page 3-148, I see that horseback riding is left out of the five fastest growing outdoor recreation activities through the year **2050**. I know that this is because the environmentalists and anti-animal groups are using your forest plan development to eliminate horse use from the public lands by that date so that statement would then be true by 2050. On page 3-149, it states that horseback riding is a high use activity in the Savanna Ecosystem Restoration Project areas. This is true. We have been riding here for many years and, historically, we have been encourage by the USFS to ride here. Horseback riding DOES fall within the niche for Recreational use on the Forest. And now some new management, has come in and decided they want to have things their way and horseback riders are now IN the way of their new Forest Plans. Well, don't that beat all.

41N - On page 3-151 (map 3,6: WRSNA Existing Conditions) You have listed in the Legend that the Silver Dianond 'Mikkelson Trail' aka River Trail is a "User-Created Trail" and thus implying that is not a USFS approved recreational trail. I would remind you that a Mule Club, with the permission and co-operation of the Forest Service, put the 'River Trail' in place in the 1980's so historically it needs to stay available to horses. It is our own 'Mikkelson Trail', named after one of the trail blazers who helped put the trail in and who was one of the Rainbow Ranch family members and member of the Mule Club. Most people just call it the River Trail.

41O - And where are all these 'user-created' single-track trails that are mentioned anyway? Perhaps they are the older two-tracks that have become re-vegetated since closing to motor vehicle use and **that we were told were open to horseback riding** are what they are talking about. Someone in USFS is not keeping historical documents like they should be. Or maybe that is the plan.... To eliminate proof of historical uses so you can say there is no proof. Like the River Trail.

41P - Also the 'user-created' dispersed camping areas were within current guidelines at the time and were, historically, acceptable by the USFS at the time of creation by users. It was called Primitive camping then. This was before 'Leave No Trace'. SO, do not sound like we did something that was not approved of by USFS in the past. Every time

41P you use the terms 'user-developed' or 'user-created' here you are using it in a way that implies illegality. They are not. Is it any wonder people are upset at what you are trying to do here? You are trying to gain support from non-equestrians and use them to help kick us out by making horseback rider look like illegal users of these areas.

41Q Every time I have called the USFS office in Baldwin to ask if some repair could be done at a certain place on USFS lands, I was told 'there was no money in the budget for repairing areas that need fixing' especially when horses were involved. Is it any wonder sites continued to receive more damage? And as soon as any particular site was pointed out, it was posted 'closed' to horses. Now you are able to point your finger at horseback riders and say we caused a lot of damage, even when it likely took 25 years for the damage to occur. Many times I was willing to get horse people together with equipment if need be, and repair these areas myself using my own money and money others were willing to give. All we needed was a USFS engineer or trails person to show us how to do it your way. But we were told it could not be done. So who is really at fault here? USFS is. There is a reason we don't tell you where we ride anymore and that is because you are just looking to put up another 'No Horses' sign.

41R On page 3-149, it is mentioned that there is a 'user-created' day use parking area. We were told to park here for years by USFS personnel! The sand blow out has worsened because USFS refused to fix it. Some boulders placed near the big tree and gravel would have done the job at a cost of about \$300 at the time. You people had better stop making it look like all these problems areas are all our fault and you USFS had nothing to with it. You did nothing to help when help was asked for and actually blocked our efforts to improve or repair areas.

41M Did USFS try to engage horseback riders back then? No. Why? Because horseback riding and foot travel were in the same designation as far as USFS was concerned. AND horses and horse people were not the problem. WE were the kind of users USFS were trying to keep on the forest. WE fit in the forest 'niche' remember? Why? Because we did not require facilities that cost **a lot or any** money at all.

41S If the 'erosion' being spoken of on page 3-150 is at the southernmost place where people water their horse on the River trail (and I am sure it is), then perhaps some trail and bank stabilization can be done in that area so horses can drink and erosion and sediment movement is minimized by horse use. Stone, local gravel and rock could be place here. Cooperation could be done with the Back Country Horsemen group on this and other projects to help foster good will between USFS/ USFWS and horsemen or other user groups could partner as well on a project like that. I am sure some of the damage has been done by others (river users, fishermen and campers using ATV's here and I witnessed it myself) and not just horseback riders and their horses. *Stabilizing this area would be a benefit to all users. I can show you much worse damage by ORV and ATV users on their trails but I do not advocate kicking them out of the forest.*

41T The east-west hiking trails are used so little they appear almost non-existent and are not suitable for horseback riding as we are a little higher up than a hiker and getting your face ripped open on tree branches is not enjoyable. I also see that they are not marked on any of your maps in the EA but they are marked on the large colored maps you sell at the Baldwin USFS Ranger Station. Blue Dots mark the hiking trails by the way. I also have one of those maps.

41U One of the open areas where it is popular for groups to historically camp with horses was either a log landing area or an old homestead and was never an open savanna area. You can tell this by the over 100-year-old trees still standing on the high, flat-topped camping area that has been gated off. We were told by USFS we could camp here also.

41V — As I read through the EA, I surmised by the wording that the success of this project (measured by increasing numbers of KBB) is speculation at best on your part and it sounds like you are trying to do this project with information based on some studies done elsewhere and make them sound like they will work here. Some of your information is geared toward trying to convince the public or yourselves that we need to protect KBB and IB at ANY and ALL COSTS!

41W — This EA has included very inflammatory and unproven statements about damage that forest users *may* cause to KBB habitat and other wildlife that has not been substantiated in reality. Yes, people do cut firewood where it is easily accessible, but those 'potential' IB trees are not enough to warrant closing down firewood cutting and access to it. In your own words in the EA, the IB favors dead trees *along the river corridors* and *is not found to inhabit HMNF lands south of Tippy Dam*. People do not gather firewood in lowland corridor areas [where you say the Indiana Bat is *likely to be found in the future*]. It is too difficult for the average homeowner to harvest firewood in those steep or swampy areas. You have stopped many homeowners from gathering firewood by closing more areas off for the IB, which is exactly what you wanted to accomplish – to keep people off the forest. Again, your EA has stated that there are no known IB nesting or brooding on the HMNF south of the Tippy Dam area. And yet your firewood cutting permit maps have so much designated areas closed to cutting to provide habitat for IB that you have eliminated this use of the forest for many people. Including the *possibility* of the IB in the area is misleading the public into thinking you need to provide habitat for it and you use it to keep humans from the forest environment.

41X — I feel the stated reasons for closing the area off to any and every user is very inflammatory toward those users so it can be justified closing the area. It goes to show you have not really studied the long term effects of razing the forest in these areas but are using general statements by persons whose agenda is to close the forest off to everyone by saying that all users are going to be bad for the KBB and other wildlife. It amazes me that you can justify destroying habitat, mating rituals and food gathering activities and cause death of other wildlife at the expense of a butterfly and human forest users. I do not know of any horseman who would chase down a basking turtle on a log in the water and harass it. Are you planning on keeping canoeists off the river since they are more likely to disturb basking turtles than horseback riders would? A turtle on the ground looks like a rock to a horse and they avoid stepping on things like that so even on the ground, the turtle is safe from horses.

41Y — Savanna restoration projects like these do not help the local economy but damage it by lowering property values due to humans being denied access to these public lands and frankly this complete Savanna Ecosystem Restoration project is beyond common sense. Millions of dollars will be spent with no ending in sight using an open-ended statement of 'further' and 'continuing studies'. AND you are alienating the local human population to boot! ***This project is such a large one that we wonder where you are getting the money for it. And why didn't you have money for trail repairs when they needed to be done?***

41Z — My husband would prefer to continue to fish for sucker in the White as he has always done for the past 45 or more years. His favorite place is along the southernmost point of the River Trail, where the horses water in the river. However, due to a severe injury to his hip, he cannot walk from either Arthur Rd. or Winston Rd. and then down an unimproved two-track to his favorite fishing spot if you close off the road to vehicular traffic. He is also an avid bowhunter and can walk a short distance over fairly even ground to a ground blind. I have to help him drag his deer out to the vehicle to bring it home. I drag it out with my horse.

As you know, much of this area is sand and gravel. Creating an open Savanna Ecosystem will effect a climactic change in the area by a raise of 10 degrees in the summer and lowering by 10 degrees in the winter. I know this for a fact since I live to the northeast of this area on an old 25 acre clearing of old gravel pit along the White myself. My next door neighbor is much warmer than we are, sometimes by more than 10 degrees and only 500 feet away with a buffer of pine trees on his west side.

41AA - Such a change in temperatures created by this project could have a negative effect on the human and livestock populations that will be affected by higher winds and subsequently lower wind-chill factors in the winter. This will result in higher consumption of heating fuels in winter and more electricity to cool our homes in summer due the +10 degree rise in temperatures. Our livestock will require more food and that means more manure produced. With the declining land values due to impact our counties as a result of this Savanna project, this will mean less money for the counties to plow the expected increase in snowfall. More disruption of power and other essential services can also be expected due to increases in snowfall and blizzards. I remember winters where we had 6 inches of snow daily along the lakeshore snowbelts and I can foresee that clearing 20,000 plus acres of trees in the three county area will certainly impact us in a dramatic way. This project will not just affect forest users, but everyone located downwind from these project areas, not only with climate changes, but with air quality from you prescribed burns. This could potentially impact over 100,000 people given the populations of rural and city dwellers that will be affected by no forest to buffer winter winds and lake effect snows.

41BB - Natural changes happen everywhere you look. I know that in 10 or 20 years you will have a 'new' Forest Plan since the Savanna plan to give habitat to a butterfly will not have worked. You may have a Savanna but it is likely that you will not have a butterfly simply because a bent sex part of the KBB doesn't work very well for reproduction purposes. (That information is from a botanist participating in studies of the butterfly a few years ago.) And I will hazard a guess that the 'new' plan is to let the forest regenerate by itself, *as you already state will happen in the Plan*, and you will be PLANTING wood lots because the current Savanna plan has failed. By then, USFS and USFWS will have practically eliminated the turkey, deer and squirrels from the area. Then the coyotes, bear and cougar will leave the forest and end up in our back yards after you harvest too many deer [because they eat lupine] and the squirrels are eliminated because they plant acorns from which oak trees grow or the turkeys eat the KBB. AND no one will want to walk in the forest because of the rattlesnakes that were planted. But many of us believe that the outcome you want, regardless of the KBB, is to eliminate humans from the forest. We know that God placed man in the outdoors. This was so man could see all that God created for him and give praise to God for all He provides. When you limit opportunities for mankind to praise his Creator, you are thumbing your nose at God in and His plan for the Earth.

41CC - According to your own studies and past project failures, you do know trying to save the KBB [remember - whose only distinction from the Melissa is a bent sex part], that this project will not work. I remember the "No Hunting" of black squirrels years ago because it was thought it was a rare squirrel? (Sorry, that was a 'state' thing too and USFS had no part in that) Then it turned out it was only a color phase of the everyday common Fox or Gray Squirrel. While riding through small towns in Michigan I have seen some really strange color phases of Fox and Gray squirrels.

to 8.2. While it is most common in areas that have been mined for gravel, Spotted Knapweed does **not** grow where there is **abundant** deposit of horse manure.

41EE - Do you see NNIS **growing** on the trails caused by seeds contained in horse manure? **NO!** The horses gut is too hot and destroys seed viability. This fact of not passing viable weed seeds in horse manure has been proven. I do not have the reference for the actual documentation but it was presented by horsemen when working to stop the Pigeon River closure and the 'Right to Ride' law that was passed earlier this year. I do not know how or where the studies you are using were done to prove horses are detrimental to habitats on the forest but they sure seem skewed to favor kicking out the horseback riders. I do not see any studies of the horse trails in the Pines Point Area where NNIS are growing that has proven it was brought in through horse manure.

I buy the best weed free hay I can find and some weeds still grow where manure is concentrated. I would attribute this growth of weeds to the natural storehouses of seeds in the soil that are just waiting for certain conditions to present themselves, and would anyway, if and when certain conditions occur, regardless of horse manure. You are using the same method to present to us a cycle of KBB populations to promote this Savanna Ecosystem Restoration Project and you forget that we humans ARE NOT in control of what happens on Earth. God is.

### Some Suggestions for the WRSNA/ Savanna Ecosystem Restoration Project

I would urge you to amend project Alternative 2 to more closely align with in Alternative 1 and keeping as many of the current roads open as possible.

41FF - I suggest you eliminate Alternative 3 altogether. The closures written in this proposal do not need to be done. It will cost no more to repair roads than it will to decommission and obliterate them or turn them into horse trails. Closing the forest to users will have an extreme, negative impact on the local economy. Please seriously consider the suggestions offered herein.

My suggestion is for a compromise of butterfly habitat management limited to the existing 519 acres for 10 years to see if what you are proposing on a large scale will **actually work (which you already know it will not) before you waste so much money on this project.**

41GG - Even a 5 year moratorium on the larger scale project would allow time for you to engage horse groups and other user groups to work with you on a more positive trails access plan and put you (USFS) in a better light in the eyes the public who will be drastically affected by your proposal to decimate so much of our forest.

41HH - *The September 2010 EA says that you propose to treat (clear) the woody plants in BANDS with herbicides and other methods and that the minimal contamination of food sources will only hurt other wildlife in the area for a little while and they should recover to some level. All this so as not to kill off **all** the KBB that may be nearby so they will (hopefully) naturally repopulate the treated areas.*

I would suggest that you prohibit any and all uses of herbicides on the public lands.

41II - I would propose that, if you must create KBB habitat that you do it AWAY from the existing roads **first** and leave the roads and trails open for use. If KBB habitat is

geared toward steering KBB down corridors then you should be able to entice them away from open roads and trails.

41II I would propose short access trails of 100 feet from road to habitat, for people to walk down, creating a buffer zone (or what is a safe and reasonable distance to minimize NNIS in created habitat areas), pleasing to the eye, to the edge of small savanna areas for viewing KBB and plant life such, i.e. nectar plants as food associated with KBB. You could even re-forest the edges of roadways as a buffer-zone to keep the butterflies in their habitat and away from vehicular traffic. (Piling Brush around created savanna areas is an eyesore on the forest but I'm sure the rattlesnakes will love it.) This buffer zone would likely eliminate or reduce vehicle/KBB collisions without closing roads. According to your proposed habitat creation plan, you believe the KBB will move into those created areas. They will then be safe once you move their habitat away from open roadways. This way you can satisfy the need to reasonably keep NNIS from entering KBB habitat and keep roads and trails open for use by the public. This will also allow you to work on the habitat while we use the forest.

FYI - Lupine is poisonous to horses and horses will not eat them! If you put up signage reminding horseback riders of such poisonous plants in those areas, you won't have horses walking in the lupines. You and I do not believe you can stop birds from planting seeds anymore than you can keep deer from eating lupine or stepping on eggs and larvae of KBB. Can you keep wild birds from eating KBB?

In your studies you state that KBB populations have severely declined and this occurred after more roads were closed.

41BB As a side note I would like to interject something interesting here. Some breedings/matings of horses [Arabians, Paints, and others] develop a lethal genetic mutation and the resulting foal will die within hours, days or weeks of birth regardless of the best of veterinary care. This is natural selection or 'survival of the fittest' if you will. Of course, IF the KBB is just a result of a defective gene of the Melissa AND that bent sex part is what is causing the KBB to decline in numbers, then it SHOULD be allowed to die out so that the more perfect specimens of the Melissa would thrive. You might even discover the possibility that the KBB is, in reality, just a defective Melissa and the Melissa will just keep on producing defecting offspring. Or maybe someone already knows this and isn't letting on?! Just so that such a project can be attempted for some other reason - like kicking horseback riders and other people off the public lands.

41JJ Again, I would suggest that all trails and roadways should stay open to vehicular traffic, with the exception of the Semi-Primitive Non-Motorized area, that horseback riding, hiking, hunting, firewood gathering, and other users of the forest, be allowed continued, safe access in the entire area, with the exception of the smaller savanna areas for butterfly habitat, that you say you are mandated to provide by the Endangered Species Act.

41S  
41KK  
41S Your statements assume that not watering horses in naturally occurring water such as rivers, stream and puddles, "may" reduce soil erosion and sediment delivery into the river system. Well, I have to tell you that if you think deer don't cross the river in great numbers and do damage to the same rivers, streams and puddles, then you live in a big, bubble of ignorance. Oh, that's right, you plan on virtually eliminating whitetail deer from the area also. By the way, Knapp Lake has not been a 'lake' for over 20 years. You people need to get out of the office and see what you are talking about. Horses do not go into 'Knapp Lake' to water. They will sink to their knees before they even get to close to any water in the 'ditch'. Only new people don't know they should

↑ stay away from the ditch and the other two former wet spots so signage should work here.

41S Canoeists do as much or more damage than horses along rivers. Are you going to put up 'No Camping' signs along the rivers? I won't ask you to. Watering areas can be designed to allow horse use without damaging the areas and eroding the riverbanks. USFS knows it has been done in other areas of the country, even in our National Parks.

41N What you have proposed in Alternative 2 is not enough trails and you are assuming that horses will do more damage to butterfly habitat than your mechanical and by-hand clearing work over the next 10 years will do. How much habitat will soil scarification every 4 years destroy? You are saying you will turn over from 50% to 75% of the soil in any given habitat clearing. And you don't want horses walking on a butterfly.

In Appendix A, you will allow mechanical brush hogging in known KBB habitat clearings limiting it to 50% of the clearing so you don't kill ALL the KBB in the clearing. You will also do soil scarification, turning over 50% to 75% of the soil in known KBB clearings. And yet your statements are automatically assuming that horses will actually be walking in restored KBB habitat and you have used studies stating the compaction pressure of hooves, etc to put in peoples minds that horses will kill more butterflies, eggs and or larvae than your restoration methods will. Yet if you detect a horse riding through KBB habitat, an executive order will be issued closing the forest off to horses. You have not proved that horseback riding will, in reality, do damage in these areas to the extent of your 'approved' up to 50% of mechanical brush hogging of known KBB habitat or soil scarification (turning over the soil as in 'plowing') will. In reading your EA, it can be understood that this project is more about getting rid of horseback riders and other forest users than about the KBB. You are just using KBB and IB to do it.

41LL In Appendix C, you propose to use chemicals known to cause Mammals to not absorb the nutrition from food they eat because of ingestion of herbicide treated plants.. These chemicals affect the mammal and its ability to absorb nutrients from food and will basically cause the animal to starve and/or freeze to death since you will be treating these areas in the fall and the animal will not be able to put on weight for the winter. But since this will all happen in the winter and there will be no one to witness the slow death of these animals, you are all right with this. After all, you need to kill whitetail deer because they eat lupine, which the butterfly needs.

41MM I would like to see you use common sense and leave as many existing roads and two tracks open for horseback riding as there have been in the past, since the trail and roads are already there. Or, if you decommission roads, I suggest that you replace them with as many miles of trail as you close. In just a few years the two-tracks leading in to what used to be Knapp Lake from all directions is regenerating ground cover and are closing in because it was closed to motorized traffic. Are there plans to dig out Knapp Lake? There is virtually no maintenance scheduled specifically for horse trails except for the Hungerford Recreation Area. Many of us can no longer afford to drive that distance or want to pay the higher camping rates now in place. Pines Point gave lower income people an affordable (*Free*) place to camp and ride but now I suppose this will change here, too. I can already see what the downturn in the economy has done to horsemen. They are buying smaller rigs and tenting it rather than opting to mortgage their retirement funds away for that big, self-contained LQ horse trailer and diesel truck to pull it with. This is also why there is an increase in private property development near public lands open to horses. This Savanna Ecosystem Restoration project will deter that for certain. Oh right. That is exactly the agenda, isn't it.

41NN On page 3-171 you mention that we horseback riders can go ride at the Double JJ, Rainbow Ranch or on MDNRE lands. Do you think we are that stupid? If we take

our horses to either of the privately owned stables, our horses are likely to bring home sickness and disease that we avoid by dispersed camping or camping with others whom we know have healthy horses. I have had the privilege of riding the trails at the Double JJ and under the new ownership we are not welcome to bring our own horses there to ride unless we pay an outrageous fee and or board there overnight in a barn full of transient horses from who knows where. Most riding stables do not allow outside horses near their facilities in order to keep their rental string from contracting sicknesses and disease from outside horses. And MDNRE land? Yeah, right. Some of that is located within the WRSNA. The other lands are still closed to horses even though the Right to Ride Law passed this year mandates that it be opened back up to horses. Or I could haul 2 hours away to a State Park where there might be space to park and ride at a price.

41NN

You people have no clue what Trail Riders do or why they do it. You sit behind a desk and pretend to sound like you know how to solve the dilemma of where we can ride when you kick horses off the public lands. We have our own horses because we are horsemen and horsewomen, not because it is something we want to do once in a while, like fire up the dirt bikes and go for a spin.

The likelihood that horseback riders would shift to the OTTO Twp. section to ride would happen because you forced us out, not because we voluntarily left WRSNA.

41FF

I would rather see this whole area opened up to more horseback riders so our local economy can flourish. We have no places here for people to work but some could profit from horseback riders coming in to ride. There is no reason we cannot have your Savanna and no reduction in horseback trails, too. You should not put in any horse camping where people have to pay.

In regards to closing the Forest roads, they can be replaced with single-track trails around perimeters of habitat and still allow horseback riders to enjoy butterfly activity in season without trampling them. If you put up signs in habitat areas that tell horseback riders to stay on the trail through those areas – they will, but they would like to view their activity as well. We horseback riders would like to see some hitching posts so we can dismount and tie up but not damage tree roots in the process while we view flight activities through binoculars. If horses poop at the hitching rail, at least manure would be confined to an area near the road. If, by chance NNIS ever grew there, at least it would be easier to eliminate.

4100

If you inform horseback riders of nearby areas that are open to cross country travel, I would surmise they would stay on the trails even in those areas that are open to cross-country travel. That way you will not have to close off the whole forest in the 3 county area or change the rules for ALL of the Pines Point and adjacent townships. If you would provide maps like the nice ones for the Hungerford Rec. Area and show the public you are willing to generously accommodate them, you will also find us friendlier to deal with. Just don't try to slide around the truth by telling us what you want to us to hear and then keep on doing what you dam well please anyway. I'm pretty sure deception will not put you in a favorable light with public land users. Also, it is a good guess that you are hoping that horseback riders who did not receive this information packet and have no knowledge of what you are trying to do on the forests are the ones whom you will use to eliminate horses from these areas.

41PP

While you are spending all this money, might I suggest a couple of river crossings or recreational bridges for horseback riders, hunters and hikers or mountain bikers to access trails on both sides of the north and south branches of the river? This has been done in other areas of the country and I think it would work here as well.

Recreational access bridges would allow access to most of the area and some of them

41PP — could be placed so horsemen and others are parking and camping out of the immediate Metapopulation areas. Providing a wider area to ride will disperse horseback riding and lessen the impact on the trails and roads. You may be correct in that it may also increase horseback riding as more people learn about the open trails. Perhaps then you might accommodate users with a horse/mountain bike/hiking trail that connects Muskegon, Oceana and Newaygo Counties with more recreational opportunities and other horse-friendly private camps placed strategically so we can enjoy the forest in different areas all by horseback.

4100 — Horse campers and non-horse campers are a dangerous mix. Non-horse people are not usually aware of the danger of not keeping a watchful eye on their children around horses and someone could get hurt or killed from even a small kick by a horse. I once saw two happy, squealing little girls run up behind a tied horse and they both got kicked and went through the air about ten feet. One girl was knocked out cold. The horse could not run from the children so it did the instinctive thing and protected itself. It was not the horse's fault but the parent of the children for not paying attention to where they were and what they were doing. The girls are fine now and do not remember what happened. They are my granddaughters.

Requiring Day Use area users to remove manure is easy. Requiring this in a camping area is not so easily done. Picking up horse manure is not like picking up dog poop. You can't put it in a baggie and put it in you pocket until you find a trash can somewhere. This is not a paved city bridle trail shared with baby buggies. I believe you only suggest this because you know horse people will not use the area if you make this a rule. That is a dirty trick to use and poor example of the art of compromise. I would suggest that bunkering manure and unused or spoiled hay in camping areas would be more feasible. I prefer straightforward people and not someone trying to sell you a lie.

I have seen the destruction the jeeps do and the auto parts they leave behind. That is irresponsible on their part.

41QQ — To make them happy, how about designing a 'Rubicon Course' for them to adventure on? Lots of rock, boulders, gravel etc. even if you have to ship it in and landscape it for them. I like the rocks and gravel plan myself since that surface will reduce sediment runoff and the like, take more abuse and make them happy. I don't use Jeeps or ORV's but they are affected by this project as well.

I would suggest repairing the really bad part of FR 5306 (wet spot) and other Forest Roads where there are unusually deep ruts or bad sections made by people avoiding wet spots or getting stuck or just plain digging holes with their vehicles. That would reduce tree damage and new tracks made to avoid the bad holes. You are going to maintain roads for 'administrative purposes anyway so why not for everyone else. I assume you will be making roads solid for logging operations and solid road access to viewing areas such as those in the northern Wisconsin area of savanna restoration.

41RR — I would suggest USFS make roads safe so emergency vehicles can get to people stranded or injured on or along the river and or the River Trail. God's Word shows us that human life is sacred over and above animal and plant life. Someone with a broken back or having a heart attack, may be further injured by a rough ride out in an ambulance or could die due to a closed road not allowing Emergency vehicles in. It is likely that an Ambulance could NOT travel the forest roads in their current condition so they really should be improved. USFS would be able to get equipment in and out with less damage to the forest AND to the equipment purchased with our tax dollars. This

41RR would save tax dollars used for equipment repairs and down time and you would not need to haul in equipment to remove debris from a road just to allow emergency vehicles in thereby saving more tax dollars and possibly a life. It does seem there would be little cost difference between a little road improvement and dragging stumps to block or unblock a road and/or constantly replacing gates. I would rather see dollars spent on improvements on the major forest roads than gates to block them. I have seen many damaged gates and I know they cost about \$100 or more each just for the gates themselves.

To minimize damage to wet or riparian areas, your restoration project can stay on schedule during an unexpected wet spell if you use weight-bearing platforms placed across these areas to greatly lessen your impact on land, roads and trails with heavy equipment. I have seen these used on some construction sites where I have worked.

**In Conclusion:**

I have read the EA and frankly cannot see why you are attempting and continuing to do this. If you think we can't read between the lines, you must think we are all stupid. Many of the conclusions and statements sound exaggerated to imply that such horrible damage is happening or will happen in the 3 counties that all the forest should be closed immediately to save a small number of a butterfly that might be the result of defective genetic mutation and would not reproduce anyway! It also sounds like you will destroy habitat for more species than you are trying to save.

41B I see you certainly use many words in the document to project the image that forest users 'will' destroy habitat (the same habitat you are proposing to decimate), step on turtles, disturb mating patterns of wildlife and birds, etc. Isn't this tactic called 'fear-mongering'? There is actually no proof that this has occurred or will occur in the future. Poaching of deer or other human food animals have been going on for years and are not your concern except for the fact that you want to use this statement to convince everyone to keep people out of the forest. I don't poach or promote poaching. However, I see YOU have no problem with destroying the population and habitat of the same wildlife for the sake of a butterfly. I really think you want to keep people out so they cannot witness the deer starving to death because of herbicide applications. If anyone sees skinny deer, you will have the DNR close these counties to everyone until some 'testing' can be done. And when the deer are all dead they will no longer eat lupine.

I feel I need to remind you all that God did not plan for the Earth to last forever. There was a time for dinosaurs and it has ended, the same as there is a time for many species to end and one day soon God will call an end to us as well and we will all have to answer to Him. Yes, God told man to subdue the earth and care for it. By the way, He meant 'because of your disobedience, you have to fight the weeds and raise your own food now because I'm kicking you out of the Garden and if you eat of the Tree of Life you will live forever in your Sin.' HE said it in a more loving way but too many of you don't seem to hear Him. He never meant for us to keep the earth looking like a Jurassic park. God has placed all the water, oil and other resources man will ever need to use here in the earth until such time as He deems it is done. This Earth will never be returned to a Jurassic Park-like environment because God has not ordained it to be so. Try all you like but *it ain't gonna happen*. But I'll bet if there were dinosaurs here, you would not object to them stepping on or eating a butterfly or getting a drink out of the river or pooping on the trail.

41SS The project, as currently laid out in the Savanna Ecosystem Restoration - EA information you present to us, will also be a financial debacle for the next 50 years or

4155

more as there is no real end date for this project. And I only got to page 3-171 and ran out of time to read more before this time period for comments and suggestions was up.

4100

I would hope that you would work with all the user groups to develop a plan that would not exclude any of them and also give a larger amount of trails and a better forest experience for all, in spite of KBB and IB.

Thank you for your consideration.

I would also like to request that you send me a copy of the final decision as soon as it becomes available. Thank you.

Sincerely,

*Christine A Hubert*

Christine Hubert

43A

43B

43C

43D

43E

43F

October 23, 2010

Christopher Fredrick  
Baldwin-White Cloud Ranger District  
650 N. Michigan Avenue  
Baldwin, MI 49304

0-5801  
RECEIVED J.M.

Dear Mr. Frederick,

RE: Savannah Ecosystem Restoration Project / Karner Blue Butterfly / Oceana and Muskegon Counties

My comments to the following areas of the Environmental Assessment (EA) for the Savanna Project / Karner Blue Butterfly Habitat surround the lack of "studies," planning, enforcement and maintenance in the mapped area for Alternatives 2 and 3 of the plan.

42A

1. **Chemicals to be used to rid wood and non-wood plants in the form of herbicides** – Glyphosate, Triclopyr, or Imazapyr – almost 1.5 million dollars worth. *There are no studies* to indicate the long term effects on the surrounding environment including the proximity to White River and how close it is to the mouth of White Lake and Lake Michigan. *Nor any studies* to indicate how they will affect our crystal clear ground water and our local population who have a higher than normal rate of eating fish from local lakes and rivers, including the White River. *There are no studies* to indicate the long term effects of eating meat from game and fowl that have been exposed to these chemicals either by ingestion or exposure.

42B

2. **Emissions from initial burning** - metric tons of Methane, Carbon Dioxides, and Nitrate Oxides residues. *There are no studies* to indicate neither long term effects nor where the prevailing winds would take contaminates. Also of note, the prevailing winds are typically "convection" winds due to the river flats in the affected project area and are impossible to 100% predict direction.

42C

3. **Emissions from secondary burning of chemically treated areas.** *There are no studies* done on what burning the applied herbicides will do, such as what emissions will be released and what the long term effects are.

42D

4. **Classified Endangered, Threatened or Sensitive species that live in the affected areas** – Blanding's Turtle, Eastern Box Turtle, Hill-Prairie Spittlebug, Northern Goshawk (with active nests), Wood Turtle, Bald Eagle, Cerulean Warbler, Dusted Skipper, Frosted Elfin, Louisiana Waterthrush, Prothonotary Warbler. Others include Red-Headed Woodpeckers and Whip-poor-wills (active nests), let alone the deer, bear, coyotes, rabbits, snakes, including the Michigan Rattler and other wildlife too many to mention. *There are no studies* regarding what numbers of the specific species and the effects of this mass murder by man's hand on these local populations. **This includes the existing Karner Blue Butterfly in the zones to be burned.** It appears this aspect of the project plan is contradictory to the U.S. Government Act which protects these living, propagating and flourishing endangered, threatened or sensitive species.

42E

5. **PELT Payments to the affected Townships.** Did I read that the mandated funds (25% of the timber sale) for PELT will be diverted out of the affected townships? *Please explain* as this is improper diversion of funds.

42F

6. **Improper use of OVR grant funds:** Longtime and regularly used 34 pristine campsites will be reduced to 11 and "refurbished" with funds from an ORV grant. This appears to be an improper use of the ORV grant.

- 42H 8. **Economic Impact on the local economy and property values.** *No studies* have been done to reveal the effect on property values and decimation of the existing recreational and hunting uses on local businesses.
- 42I 9. **No consideration and discrimination of certain groups of long time users of the project area.** Closing down the roads *eliminates* the ability for the elderly, handicapped, and young children to access the White River as they always have and should be allowed to continue to do so. The current planned closure and limited access points have either a significant hill to navigate or a long, hazardous walk.
- 42J 10. **Emergency vehicle access.** There is *no study* on how emergency vehicles will reach accident victims in the closed off areas of the project for canoers, hikers, bikers and horseback riders allowed by alternatives 2 and 3.
- 42K 11. **Plan for future enforcement and maintenance costs.** Whenever new rules are in place so comes increased cost of enforcing them. *No studies* have been done to accurately assess the cost involved with enforcement and future maintenance of the new savannahs.

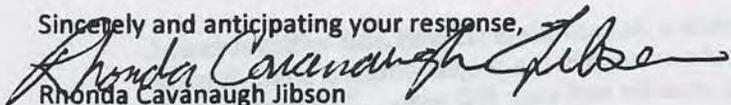
I expect a full answer to all of the concerns in this comment to the EA. I also request a copy of the Notice of Decision when made public.

42L **The USFS must apply – rather than disregard -- the relevant statutory and regulatory criteria regarding this project. Due diligence in studying the plan in the affected and mapped area must be done.**

42M Although I am sure there exists an argument as to why the notice of the release of the EA was in a Lake County paper rather than papers circulated in the affect area, it is very telling of the mind set or lack thereof, of the local human population in the project area that is to be chemically bombarded and rid of our pristine environment and recreational lifestyle that we intentionally chose to live next too.

42N My recommendation is not proceed with any of the plans in alternative 2 and 3, and I feel any enforcement should be confined to proper use of forest roads by ticketing those that do not use them responsibly. Then plant lupine everywhere including many natural savannah areas already established in the Manistee National Forest. Encourage residents to plant lupine. The Karner Blue Butterfly will flourish as all the other species have done over the last 150 years since the lumber barons moved out, our well established forests recovered and recreational human use moved in. It won't cost 2.9 million, leave a legacy of contaminated soil, water, and wildlife and it won't murder our local wildlife populations.

Sincerely and anticipating your response,



Rhonda Cavanaugh Jibson  
Otto Township Resident and Elected Supervisor  
1036 E. Park Rd.  
Rothbury, MI 49452  
(231) 861-2959

Cc: Attorney Doug Hughes, Pat Brower, David Miehke, Dave Wilson, Myrle Phillips, Otto Township Board, Betsy Evans, Kathy and Tom Thorn

Rhonda Cavanaugh Jibson  
Otto Township Supervisor  
Page 2 of 4

comments-eastern-huron-manistee-baldwin-white-cloud  
Sent by: Diane T Walker/R9/USDAFS

To Christopher J Frederick/R9/USDAFS@FSNOTES, Leslie E Russell/R9/USDAFS@FSNOTES

cc  
bcc

10/26/2010 09:22 AM

Subject Fw: Savannah Ecosystem Restoration Project / Kerner Blue Butterfly / Oceana and Muskegon Counties

----- Forwarded by Diane T Walker/R9/USDAFS on 10/26/2010 09:22 AM -----



Rhonda Cavanaugh Jibson  
<cmsolutionsllc@hotmail.com>

10/25/2010 02:50 PM

To <comments-eastern-huron-manistee-baldwin-white-cloud@fs.fed.us>

cc: Doug Hughes <doughughes@whcspc.com>, Pat Bower <trail\_fanatic@hotmail.com>, Dave Miehke <dmiehke@hotmail.com>, Dave Wilson <wilsonforestry@glis.net>, Betsy Evans <evansbea@mindnet.org>, Kathy and Tom Thorn <ct\_mapleridgemorgans@hotmail.com>, "charscloudy@yahoo.com" <charscloudy@yahoo.com>, Walter Udell <wgu73@yahoo.com>, Lillian Carson <queen-pin-1@hotmail.com>, Carol Keck <carolkeck@alldial.net>, <wtietz67@yahoo.com>, <patriciabudde@gmail.com>, Mary Justian <maryj@hi-lites.com>

Subject Savannah Ecosystem Restoration Project / Kerner Blue Butterfly / Oceana and Muskegon Counties

Dear Mr. Fredrick,

420 A couple of my constituents visited your office today to hand delivered my comments as well as their own. My constituents were amazed that your office help said the savannahs were present in the 1800s and that neither she, Les or you even knew the names "Mears" and "Hackley." (Their collective historic presense in our area built Chicago after the fire AND built Western Michigan's economy.) It became clear that your office knows nothing of the history of Southeast Oceana County. When presented with a book that supports that our area has been wooded for over 400 years, you showed no interest in learning more and were rather rude.

Please accept the following additional comments on the EA of the subject Savannah / KBB project:

**The identification of SE Oceana county as once a Savannah is flawed and without proof.**

42P Please explain and prove the existence of a natural savannah in the project affected area. It is our contention that a savannah has not existed in this area for well over 400 years. Our proof is in many documented historical accounts of the lumber barons that existed here starting in 1837. Some of the reminant stumps in the mapped area are 7 foot in diameter. Please do the math. Browns Pond was a sawmill next to the project area that harvested wood from southeast Oceana County. Well documented and in fact, many of the roads that exist in the affected area, forestry or otherwise were at one time, lumber roads. Please read the recently published "Lumber Barons of White Lake" authored by two doctors and available at the Whitehall Chamber of Commerce. I request your answer and proof of your contention that SE Oceana was once a Savannah.

Of course you can always trump this by going back to pre-European days but I will have you know that we are working with local Indian tribes to discount your contention. Afterall, at the onset of the European

Rhonda Cavanaugh Jibson  
Otto Township Supervisor  
Page 3 of 4

42P — days, the local indians were, and still are, referred to the Northern "Woods" tribes.

42Q — **Existence of the Karner Blue Butterfly 400 years ago.** At the same time, please provide proof that the Karner Blue Butterfly existed prior to 400 years since we understand that the butterfly itself is actually an "anomaly" since it looks identical to another butterfly that is not endangered. Please explain the difference of the two butterflies in question and why the Karner Blue is designated a species and when this anomaly was first documented.

Sincerely and anticipating your response,

Rhonda Cavanaugh Jibson  
Otto Township Resident and Elected Supervisor  
1036 E. Park Rd.  
Rothbury, MI 49452  
(231) 861-2959

---

From: cmsolutionsllc@hotmail.com  
To: comments-eastern-huron-manistee-baldwin-white-cloud@fs.fed.us  
CC: doughughes@whcspc.com; trail\_fanatic@hotmail.com; dmiehlke@hotmail.com;  
wilsonforestry@glis.net; evansbea@mindnet.org; ct\_mapleridgemorgans@hotmail.com;  
charscloudy@yahoo.com; wgu73@yahoo.com; queen-pin-1@hotmail.com; carolkeck@alldial.net;  
wtietz67@yahoo.com; patriciabudde@gmail.com; maryj@hi-lites.com  
Subject: Savannah Ecosystem Restoration Project / Karner Blue Butterfly / Oceana and Muskegon  
Counties  
Date: Sun, 24 Oct 2010 20:35:31 -0400

October 23, 2010

Christopher Fredrick  
Baldwin-White Cloud Ranger District  
650 N. Michigan Avenue  
Baldwin, MI 49304

Dear Mr. Frederick,

RE: Savannah Ecosystem Restoration Project / Karner Blue Butterfly / Oceana and Muskegon  
Counties

My comments to the following areas of the Environmental Assessment (EA) for the Savanna Project / Karner Blue Butterfly Habitat surround the lack of "studies," planning, enforcement and maintenance in the mapped area for Alternatives 2 and 3 of the plan.

1. **Chemicals to be used to rid wood and non-wood plants in the form of herbicides –** Glyphosate, Triclopyr, or Imazapyr – almost 1.5 million dollars worth. *There are no studies* to indicate the long term effects on the surrounding environment including the proximity to White River and how close it is to the mouth of White Lake and Lake Michigan. *Nor any studies* to indicate how they will affect our crystal clear ground water and our local population who

comments-eastern-huron-manistee-baldwin-white-cloud

Sent by: Diane T Walker/R9/USDAFS

10/18/2010 10:22 AM

To Christopher J Frederick/R9/USDAFS@FSNOTES, Leslie E Russell/R9/USDAFS@FSNOTES, Patricia Ruta/R9/USDAFS@FSNOTES

cc

bcc

Subject Fw: Sanvanna Ecosystem Restoration-Alternative Comparison

----- Forwarded by Diane T Walker/R9/USDAFS on 10/18/2010 10:22 AM -----



pjknape1@aol.com

10/14/2010 08:12 AM

To comments-eastern-huron-manistee-baldwin-white-cloud@fs.fed.us

cc

Subject Sanvanna Ecosystem Restoration-Alternative Comparison

Dear Christopher

Thanks for sending the proposals regarding this Project. I live in Newaygo county Brooks twp and have served on the Planning

commission and Twp board and am very interested in preserving our beautiful **Forest** and Prairies. I live at

4040 east 48th st Newaygo, Mi 49337 and have 10 acres and it butts up to around 485 acres of Fed land. My wife and I have raised 3

kids here 1 majored in biology and currently a teacher in Montrose Co {NO JOBS HERE}, the other a RN and the other a Med-Tech

and I would like to think living in this Beautiful area helped in molding them, to love the outdoors. About 10 to 12 years ago the forest

service came in and managed a similar type project, Prairie restoration clear cutting and burning, I talked with some of the Forest

Service regarding this and what type of success they had restoring the Prairie. I got a answer and what they said verses what really

happen are 2 different things. They did a large area and spent a lot of tax payers money on lumbering white pines before

there maturity and not maximizing the revenue which could of help fund other restoration projects.

What they got was a few area's with some prairie, Jack pines every where, wild cherry everywhere, and took away a whole lot of

beauty and did little for the Blue Karner and was a good example of a poooooorly done restoration project.

Now 12 years later you doing a similar project to help the Blue Karner butterfly habitat and I'm concerned

43A

43A - it's going to look the same

way. It seems like out door recreation camping ,hiking, horse back riding, etc. which helps build better family's and create a bond

with Nature is way down the list. Of the proposals alt.2 I feel is the best but that falls short as far as I am concerned.

It seems like Michigan and the DNR are saying we want little recreation and a lot of no or minimal access for the family's, and

lets spend all we can for the butter fly with poor land restoration out comes and say no to tax paying family's.

In Colorado were my son lives he is amazed at all the out door opportunity's and the open ar.ans for the out of state people to enjoy

there natural resources, Horse back riding trails,camping, hiking. etc. and provide great maps to these area's.

43B - It seems like Michigan is saying we don't want you on are public land or want you in a small amount you can use this little area here.

I understand there is a balancing act and the pigeon river area, is a prime example of horrible land and man balancing act. I know we

have federal land and state land and I'm talking about both here, but family /people access are way down the list.

If you cared to do so I would be happy to show you what I consider a poor example of Prairie Restoration right in my back yard in

hopes your next project does not have the poor out out comes this project had.

Regarding your Savanna Restoration project in the white river area I hope you don't repeat the same mistakes, and in your Alternative

43C - Comparison alt.2 has my vote, but this falls short on the tax payer access and accessibility for family's which help build our youth

and there love for the out doors.

Sincerely

Philip Knape

4040 e 48th st

Newaygo,Mi 49337 231-652-3140

comments-eastern-huron-manistee-baldwin-white-cloud

Sent by: Diane T Walker/R9/USDAFS

10/18/2010 10:18 AM

To Christopher J Frederick/R9/USDAFS@FSNOTES, Leslie E Russell/R9/USDAFS@FSNOTES

cc

bcc

Subject Comment - Savanna Ecosystem Project

----- Forwarded by Diane T Walker/R9/USDAFS on 10/18/2010 10:17 AM -----



Krantzwhit2@aol.com

10/14/2010 06:28 PM

To comments-eastern-huron-manistee-baldwin-white-cloud@fs.ed.us

cc

Subject (no subject)

44A - it sounds to me that a biologist does not understand that the national forests belong to the people, not for his personal resume. the road closing idea is a slap in the face to the elderly and disabled. shame on you and you need to look for work some place else. this comment section are the people speaking, are you listening?



10/15/2010 05:20 AM

cc

bcc

Subject: Manistee national forest

424

Dear Mr Frederick,

See  
2 of 2

I just wanted to give you my opinion on the proposed plan to create a better environment for the karner blue from the people of Michigan is a mistake. Providing additional land for a better environment would be a muc Michigan. Our people have struggled enough. Please add additional land for the people and the butterfly. The

**Todd Koperski**

Dear Mr Frederick,

45A

I just wanted to give you my opinion on the proposed plan to create a better environment for the karner blue butterfly. I believe your intentions are good, but removing land and access from the people of Michigan is a mistake. Providing additional land for a better environment would be a much better choice. Please DO NOT take anything away from the people of Michigan. Our people have struggled enough. Please add additional land for the people and the butterfly. Thank you for your time,

**Todd Koperski**

comments-eastern-huron-manistee-baldwin-white-cloud

Sent by: Diane T Walker/R9/USDAFS

10/18/2010 09:08 AM

To Christopher J Frederick/R9/USDAFS@FSNOTES

cc

bcc

Subject Fw: North White River

----- Forwarded by Diane T Walker/R9/USDAFS on 10/18/2010 09:08 AM -----



"Kozel, Rob"  
<RobKozel@clearchannel.com>

10/18/2010 09:00 AM

To <comments-eastern-huron-manistee-baldwin-white-cloud@fs.fed.us>

cc

Subject North White River

46A

I cannot understand how destroying an existing natural environment makes any sense. I and my family have fished the North branch of the White River for years and vehemently object to the closing of the access roads and destruction of the existing forest. Why can't you work to preserve other areas that are important to the Karner butterfly.

Rob Kozel  
Marketing Consultant  
WMUS/WMRR/WSHZ/WKBZ  
Clear Channel West Michigan  
3565 Green St.  
Muskegon, MI 49444  
231-206-4406  
robkozel@clearchannel.com

comments-eastern-huron-manistee-baldwin-white-cloud

Sent by: Diane T Walker/R9/USDAFS

10/22/2010 10:56 AM

To Christopher J Frederick/R9/USDAFS@FSNOTES, Leslie E Russell/R9/USDAFS@FSNOTES

cc

bcc

Subject Fw: Karner Blue Butterfly Habitat Creation/Restoration

----- Forwarded by Diane T Walker/R9/USDAFS on 10/22/2010 10:55 AM -----



Jerry L

<jerry.lang61@comcast.net>

10/21/2010 11:18 AM

To comments-eastern-huron-manistee-baldwin-white-cloud@fs.fed.us

cc

Subject Karner Blue Butterfly Habitat Creation/Restoration

47A — As a taxpayer/"co-owner" of National Forest land and as a professional entomologist, I would like to voice my support of the preferred alternative presented to create/restore karner blue habitat in Manistee National Forest. The proposed actions would not only enhance habitat for the butterflies but would also benefit other rare lepidopterans as well as other species such as the massasauga rattlesnake, Blandings turtle, loggerhead shrike, and prairie flame flower. I would hope the plan includes measures to keep whitetail deer populations in the area below levels that would defeat the purpose of increasing wild lupine habitat. USFS actions to increase numbers of this endangered butterfly will not significantly impact other multiple uses of forest service land in the area.

It's important to recognize the intrinsic value of all species, not just those important to local hunting and fishing interests. As I once heard the Christian environmentalist, Cal DeWitt, once say, "Losing a species to extinction is like ripping a page out of Scripture." Let's not lose the karner blue.

Jerry Lang, PhD  
2010 W. Ridge Dr  
N. Muskegon, MI 49445  
2317444053

comments-eastern-huron-manistee-baldwin-white-cloud

Sent by: Diane T Walker/R9/USDAFS

10/26/2010 09:18 AM

To Christopher J Frederick/R9/USDAFS@FSNOTES, Leslie E Russell/R9/USDAFS@FSNOTES

cc

bcc

Subject Fw: KBB/Savanna Creation Project

----- Forwarded by Diane T Walker/R9/USDAFS on 10/26/2010 09:18 AM -----



Mark Lewis

<mlewis@whitelakebeacon.com>

10/25/2010 02:22 PM

To comments-eastern-huron-manistee-baldwin-white-cloud@fs.fed.us

cc

Subject KBB/Savanna Creation Project

Dear Les Russell (or whom it may concern),

My name is Mark Lewis and I'm a writer for the White Lake Beacon in Whitehall. I write you today not as a long-time area journalist, but as someone who uses the White River Semiprimitive Nonmotorized Recreation Area many times throughout the entire year. True, I've devoted several of my Camping with Mark articles towards sites in and around the White River SNRA, but this note is written in the spirit of an individual who knows and values this particular area, and not as someone in some sort of 'official' capacity.

Regarding the plan to clear forests/close Forest Service roads to increase the Karner Blue Butterfly: On the whole, I support what I know of the plan, and hope that the Karner's numbers do indeed increase with your labor.

48A - The plan to close some roads is a good one. While it certainly does inconvenience some folks, closing most roads going into and out of the WRSNRA would not only decrease human impact on the river and surrounding forests, but it would also make the 'semiprimitive' experience even greater. Closing roads also increases safety for hikers, horse riders and campers using the area - I can't tell you how many times I've been awakened in the middle of the night with gun play suddenly appearing out of nowhere. Limiting roads and forcing those entering to hike in would give backpackers and hikers that extra layer of what I call 'good old boy' protection.

Thus, I support the closure of most of the Forest Service roads inside the WRSNRA, and certainly National Forest lands west of the north branch of the White River (or what is sometimes called the Party Hole; an apt label if ever there was one).

However, I do have a couple concerns with plan details.

48B - • Are we sure the deforesting chemicals used to thin the forests are safe for surrounding plants and animals? Can we say for sure it will not seep into the river? Have these methods been used before, and, if so, what were the results?

48C - • Will controlled fires be used near the river? Will doing so impact the river quality in any way?

48D - • While I certainly agree Forest Service roads 5295, 9364, 5317 and 5354 should be closed, I believe Forest Service roads 5306 (off 152nd Ave.) and 9353 (south of Winston Road) should be left open. They provide an appropriate amount of access to favorite spots (with some

48D ↑ hiking in still required), while reducing the overall vehicle traffic into sensitive areas.

48E • Lastly, any plan to reduce/eliminate backpacking or hiking - in either the WRSNRA or west of the north branch of the White River - should not be considered. I think it is fairly clear that backpackers and hikers are the least of your concerns regarding the future of the Karner.

48F You've taken on what seems to be an important and ambitious plan, and for that you should be praised. I've heard for years the disdain many locals have for the road closures inside the WRSNRA, but I've always explained to them that such closures are helping to protect a wonderful and fragile park of which they often have no idea.

Personally, I consider the park a touchstone in my own life - a place I can go improve my camping skills, to be alone or with close friends, and to relive my own childhood camping experiences with my own children.

And I don't see anything in your plan preventing me or anyone else from doing the same.

Am I wrong?

Thank you for your time,  
Mark Lewis  
2446 Crozier Ave., Muskegon, Mi 49441  
231-670-1805

**comments-eastern-huron-manistee-baldwin-white-cloud**  
Sent by: Diane T Walker/R9/USDAFS

10/18/2010 10:05 AM

To Christopher J Frederick/R9/USDAFS@FSNOTES, Leslie E Russell/R9/USDAFS@FSNOTES

cc

bcc

Subject Fw: Savannah Project - Blue Butterfly restoration

----- Forwarded by Diane T Walker/R9/USDAFS on 10/18/2010 10:05 AM -----



**"Lance Malburg"**  
<lmalburg@oceanacrc.com>  
10/15/2010 03:14 PM

To <comments-eastern-huron-manistee-baldwin-white-cloud@fs.fed.us>

cc

Subject Savannah Project - Blue Butterfly restoration

Please forward to Les Russell, District Ranger, and those in charge of the Savanna project.

Dear sir,

49A — The Oceana County Road Commission is against any project which closes or limits traffic on roads & trails which provide access lake, streams, or other public lands.

We are against the proposed Savanna project, and the others which close access routes as stated above.

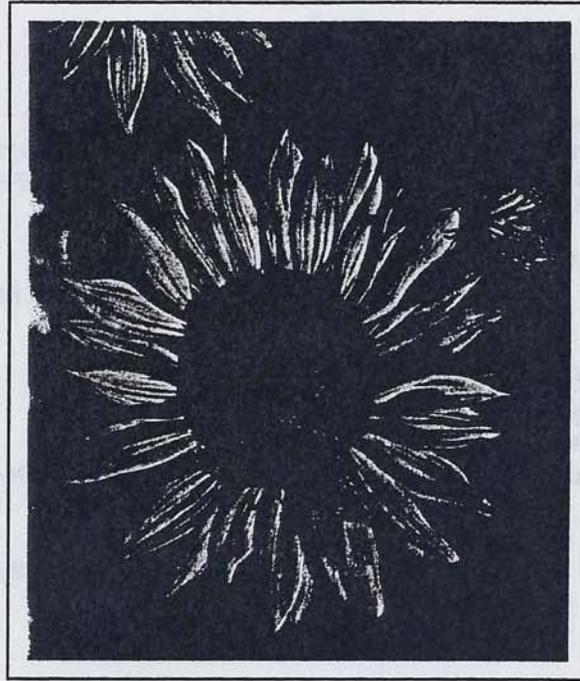
49B — In relation the Savanna t is pure hypocrisy to say that the vehicular use of the road & trail system is detrimental to the Blue butterfly. A study by the University of Wisconsin showed the butterflies actually were more abundant near the roads & tank trails in Fort McCoy Military Reservation.

Lance Malburg  
Engineer-Manager  
Oceana County Road Commission  
E-mail : LMalburg@oceanacrc.com  
Phone: (231)873-4226  
Fax: (231)873-7123

Lance Malburg  
Oceana Road Commission

JOYCE KILMER

*The air is  
like a butterfly  
With frail blue wings.  
The happy earth  
looks at the sky  
And sings.*



**World Wildlife Fund**

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*Lupinus perennis.* Pulse Family.

*Stem.*—Erect; one to two feet high. *Leaves.*—Divided into seven to eleven leaflets. *Flowers.*—Blue; papilionaceous; showy; in a long raceme. *Pod.*—Broad; hairy.

In June the long bright clusters of the wild lupine are very noticeable in many of our sandy fields. Its pea-like blossoms serve easily to identify it. Under date of June 8th, Thoreau writes: "The lupine is now in its glory. . . . It paints a whole hill-side with its blue, making such a field (if not meadow) as Proserpine might have wandered in. Its leaf was made to be covered with dew-drops. I am quite excited by this prospect of blue flowers in clumps, with narrow intervals, such a profusion of the heavenly, the Elysian color, as if these were the Elysian fields. . . . That is the value of the lupine. The earth is blued with it."

Going to the woods  
is going home.

—John Muir

And I would give you if I could,  
The sounds and beauty of this wood.  
Roy F. Zanger

Sm wilderness is the  
preservation of the world

October 23, '10

Sir:

Re: KBB/Savanna Creation Project

50A [ No further explanation necessary.

Jeanette Marossey

file: 231-861-2718



"McDaniel, Denise"  
<dmcdaniel@fremont.net>  
10/25/2010 06:11 PM

To Christopher J Frederick <cfrederick@fs.fed.us>  
cc  
bcc  
Subject Savanna Ecosystem Restoratoin Project

Denise McDaniel  
1393 S. Green Ave.  
Fremont, MI 49412  
231-924-3974  
231-924-8160

Dear Mr. Frederick and Mr. Russell:

Re: Savanna Ecosystem Restoration Project.

I have talked with both of you several times and even met with you in Baldwin considering the Savanna Ecosystem Restoration Project (aka Pine Pt project) in particular its affect on recreational horse riding.

51A I agree with your choice of Alternate 2 as the best option that you currently have developed, as it allows you to close some forest roads and areas, but still leaves some nonmotorized trail (horse trail) for our use. I understand that for some of these issues your and mine options are limited when dealing with the semi-primitive and the endangered species designations. However, I still feel that there could be some further concessions made to make the Pine Pt. areas still enjoyable to hunters, fisherman, hikers and trail riders. It is the feeling of many that the forest service really does not want the general public to enjoy and use the national and state forests. If this is so, I feel it is a shame as we have a wonderful state of forests, lakes, streams, trails, etc. that should be used by our residents and also can be used to bring more tourists and revenue into our state.

I still have a few concerns/requests regarding this project:

**Closing the USFS road #5295** right next to the river causes several issues/concerns? I think I read that this closure may not happen immediately.

- 51B
1. It will push all the horse traffic going and coming on to the foot trail next to the river – more erosion of this trail – the big loop is too far for many riders.
  2. Some horse riders or their horses are not skilled enough to ride this trail in its entirety, as it is rather challenging in spots, By leaving USFS #5295 open, if a rider/horse is unable to continue on this trail, they can jump out onto #5295 and head back or towards one of the county roads.
  3. Another concern for the safety of horse and riders, what if there is a medical emergency along this river trail and how would you get an emergency vehicle or a horse trailer to help injured people out, if so many areas are blocked off.
  4. Also what about hunters or fisherman that need to bring their game out, it is a long way back to the parking area on Arthur Rd, they may also have medical emergencies.

**Parking and camping concerns:**

- 51C
1. Parking off of Arthur Rd is at least 2 miles from the beginning of the River Trail, a long ways for horseback riders, hikers, fisherman, or hunters to go to even start the trail to reach the river. You do have one River Access Parking Area off of Winston Rd., but not for horses.
  2. I feel the camping spots are still very minimal for hunters, fisherman, horse