



IN REPLY REFER TO:

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

July 25, 2003

ER 03/427

Mr. Randy Moore
Regional Forester
USDA Forest Service, Eastern Region
310 West Wisconsin Ave., Suite 580
Milwaukee, Wisconsin 53203

Dear Mr. Moore:

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) and Draft Revised Forest Plans for the Chippewa and Superior National Forests; Beltrami, Cass, Itasca, Cook, Koochiching, Lake, and St. Louis Counties, Minnesota. We offer the following comments relative to impacts of the project on resources of concern to the Department.

GENERAL COMMENTS

The Forest Service has generally done a commendable job in developing an array of alternatives that address a range of multiple resource management issues, including the interests and needs of the public user. The Forest Service's assessment approach is mostly thorough, incorporating the use of advanced land management science and maintaining a commitment to protecting resources for future generations. The format and style of the documents are such that the reader is progressively introduced and eased into the complexity of managing a significant landscape in northern Minnesota.

SPECIFIC COMMENTS

Fish and Wildlife Resources

The U.S. Fish and Wildlife Service (FWS) is particularly interested in Forest Service management of habitats that are utilized by migratory birds (both game and nongame species), federally endangered and threatened species and their critical habitats, and selected fish species. The FWS supports a land management approach that recognizes long-term sustainability of physical and biological resources. Alternatives that maintain or establish representative associations of plant communities that once occurred in northern Minnesota can be expected to secure a biologically diverse assemblage of biota and provide long-term stability and viability of forest dependent wildlife species. In addition, the FWS supports alternatives that address all

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aspects of forest management on a watershed scale to ensure that secondary and cumulative impacts are addressed during project planning.

The FWS is concerned with long-term regional and national declines in many species of birds (see Breeding Bird Survey at <http://www.mbr-pwrc.usgs.gov/bbs/htm96/trn626/trnd.html>). Late and mid-successional species showing declines in both north-central and northeastern Minnesota include yellow-billed cuckoo, eastern wood pewee, boreal chickadee (mainly Superior National Forest), golden-crowned kinglet, ruby-crowned kinglet, veery, rose-breasted grosbeak, and red crossbill. The red-headed woodpecker (very local Chippewa National Forest breeding species) has shown a decline in north-central Minnesota. Both forests harbor significant populations of olive-sided flycatchers, an old-growth and bog species. The Breeding Bird Survey maps show a negative trend across northern Minnesota. These forests are important for this species' continued existence in the Eastern United States, and the birds on these two national forests likely make an important contribution to the overall eastern North American breeding population.

Restoration of old-growth oak forests, white and red pine forest, savanna-type habitats, and large blocks of mature contiguous old-growth habitat should assist in boosting the populations of these species. Preservation of a minimum number of snags per acre should also assist in increasing or maintaining the populations of red-headed woodpecker, black-backed woodpecker, and great crested flycatcher. Preserving riparian corridors of mature black spruce, tamarack, and white cedar should benefit various riparian passerine species, while preserving mature black ash/red maple communities and other bottomland hardwood species should benefit the yellow-billed cuckoo on the Chippewa National Forest. Preservation of sufficiently wide riparian corridors can also benefit neotropical migrants and breeding species and limit cowbird parasitism. Species benefitting from wide riparian corridors include breeding red-shouldered hawk (mainly Chippewa National Forest), yellow-throated vireo, ovenbird, northern waterthrush, and Canada warbler and many migrant species of vireos, warblers, thrushes, and other families. Clearly, natural processes historically affected vegetation within riparian zones, and disturbance which mimics such processes should be specific to the protection, restoration, or enhancement of a functional riparian ecosystem for both forests.

While the Forest Service recognizes the importance of shrub wetlands to regional American woodcock populations, there appears to be an underestimation of the value of young aspen and birch habitat to breeding populations of this species. Shrub wetlands alone are inadequate to maintain woodcock populations, even for a population level that just maintains viability. Instead, the Forest Service, through a variety of forest management practices, should provide a wide range of early successional habitats to support an abundance of this species. The American woodcock is a widely popular species which provides many thousands of hours of recreational opportunities to both consumptive and nonconsumptive forest users. Maintaining an abundance of this species will also provide strong population levels of many early successional habitat-associated species which have shown both national and regional population declines.

The FWS continues to be concerned about the long-term decline of aspen in the Great Lakes

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States, including Minnesota. The FWS believes that several of the Forest Service's alternatives can benefit early successional bird species, including American woodcock, eastern kingbird, brown thrasher, black-billed cuckoo, common nighthawk, and mourning warbler, which have all shown long-term declines in northeastern Minnesota. Additionally, there are several typically grassland species which have shown declines in northern Minnesota, including sharp-tailed grouse, upland sandpiper, eastern meadowlark, western meadowlark, and savannah sparrow. While the FWS realizes that the two National Forests can best benefit "forest" bird species, the FWS urges the Forest Service to provide habitat for these grassland species when such opportunities arise and when such management supports a scarce local habitat, is not detrimental to overall forest management, and does not lead to heavy concentrations or increases of avian predators or brood parasites (e.g., brown-headed cowbird).

Recent research has shown that 42 percent of the world population of golden-winged warblers breeds in Minnesota, with a large proportion of that population breeding on the two National Forests. Northern Minnesota is also one of only three areas in North America showing a positive trend for this species. Given that early successional aspen and birch associations (2-10 year old stands) provide one of the important habitats for this species (in a preliminary investigation S. Lutz and K. Martin noted an average of 7.56 golden-winged warblers per site in aspen stands in northern Wisconsin versus 5.75 per site in alder / aspen edges and 3.00 in alder swamps, *2002 Annual Report on the Golden-winged Warbler Project in Northern Wisconsin*), the FWS recommends that the two forests continue to maintain a mosaic of high quality early successional habitats on national forest lands to help maintain populations of this species and other declining species which favor such habitats, including American woodcock and eastern towhee.

The FWS, Region 3, Fish and Wildlife Resource Conservation Priorities (RCP) document of January 2002, (<http://midwest.fws.gov/pdf/priority.pdf>) lists 67 nongame bird species that are of high concern to the FWS in the Upper Midwest due to their rarity or known/suspected population declines. The following RCP species are found on these two forests or in adjacent lands and can potentially benefit from management activities on the Chippewa and Superior National Forests, and we encourage the Forest Service to give them special consideration: common loon, American bittern, trumpeter swan, American black duck, northern harrier, northern goshawk, red-shouldered hawk, yellow rail, greater yellowlegs (migrant), black tern, black-billed cuckoo, long-eared owl, short-eared owl, whip-poor-will, northern flicker, olive-sided flycatcher, sedge wren, wood thrush, golden-winged warbler, Cape May warbler, black-throated blue warbler, Connecticut warbler, Canada warbler, field sparrow, grasshopper sparrow (Chippewa National Forest only), Le Conte's sparrow, bobolink, eastern meadowlark, western meadowlark, and rusty blackbird.

A Partners in Flight landbird conservation plan will be completed for the Boreal Hardwood Transition Bird Conservation Region. When the plan is completed, the FWS urges the Forest Service to step this plan down to the Chippewa and Superior National Forests as it will provide a regional context for setting species priorities and management strategies for birds using the National Forests.

We note that most of the action alternatives incorporate a forest spatial pattern that limits temporary opening size to 1,000 acres compared to the limits for the no action alternative of 40 acres at the Chippewa National Forest and 200 acres at the Superior National Forest. The Final EIS should elaborate further on the rationale used by the Forest Service for increasing the allowable size of temporary openings and the potential impacts to biological resources.

Implementation of the National Transportation Policy and Rule requires maintenance and reconstruction of existing roads rather than building new roads. The FWS supports the Roads Analysis Process arriving at a minimum road transportation system necessary to provide for forest management, recreational use, and ingress and egress to non-Federal holdings. Based on current understanding, roads can fragment contiguous blocks of forest, which in turn decreases habitat values for interior forest bird species. Current road densities in some portions of the forests are such that motorized access, with its associated activities, may have a negative impact to federally threatened species and other sensitive plants and animals. The FWS favors alternatives that minimize new road construction and maximize road decommissioning. Further, the Forest Service should continue its efforts to analyze the effects of all classified roads to fish and wildlife resources.

Federal Threatened and Endangered Species

We encourage the Forest Service to utilize its authorities to carry out programs for the conservation of federally threatened and endangered species. Proactive management such as the current on-going lynx research effort, will address the needs of these species in relation to forest management practices. Incorporating elements of such guidelines as the Lynx Conservation and Assessment Strategy, Northern States Bald Eagle Recovery Plan, and Gray Wolf Recovery Plan at the Forest Plan level will assist with the transition from overall forest direction to the project planning level.

The FWS concurs that the federally listed bald eagle, Canada lynx, and gray wolf and its critical habitat are known to occur in all or portions of the Superior and Chippewa National Forests. The FWS is coordinating with the Forest Service on the completion of section 7 consultation for this project in accordance with the Endangered Species Act of 1973, as amended. The Forest Service is currently preparing a Biological Assessment and will be making an effects determination for federally listed species and listed critical habitat. The FWS is prepared to complete the necessary consultation in a timeframe that concludes prior to the Record of Decision for this project.

Specific Comments on Proposed Forest Plan, Chippewa National Forest

Page 2-16 (O-WL-24) Black tern: Exclusion zones for motorized and perhaps even human-powered boats should be noted as a possible management tool in the vicinity of nest sites. This same comment also applies to the trumpeter swan (page 2-16, O-WL-23).

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Page 2-16 (O-WL-26) Common and Caspian terns: Add "and common tern" to the last sentence in the paragraph so that it reads: "Identify high quality potential nesting habitat for Caspian tern and common tern on Leech Lake . . ." The existing common tern colony on Leech Lake is one of only four active sites in Minnesota and any additional expansion of the number of colonies would likely benefit this species.

Page 2-17 (O-WL-37) Northern goshawk: The goal of 20-30 breeding pairs seems overly ambitious considering that many territories are inactive during a given year and that only 9 breeding pairs were located in the summer of 2003. Perhaps 20-30 recently active territories would be a more reasonable goal.

Chapter 4 Monitoring and Evaluation: Monitoring is a key element to predicting the effects of a planned action and will have a significant bearing on the success of a forest planning effort. The Forest Service is encouraged to further expand this chapter to ensure that uncertainties associated with standards and guidelines are adequately addressed.

Specific Comments on Proposed Forest Plan, Superior National Forest

Page 2-67 (S WL-6) Boreal owl: A 200-foot-wide exclusion buffer for management activities seems too small considering the fact that researchers have found shifts in nesting locations as great as 200 meters during the breeding season (*The Birds of North America*, No. 63, p. 11).

Page 2-67 (G WL-13) Northern goshawk: Since a primary forage item for the goshawk is ruffed grouse, adequate habitat would seem to require sufficient early successional habitat patches on the forest landscape to support an abundant population of ruffed grouse and other goshawk prey. This should be noted in the Plan.

Page 2-68 (G WL-18) Three-toed woodpecker: Additional management activities that could sustain this species' presence on the forest include allowing some insect-infested stands (particularly those infested with bark beetles (*Scolytidae*)) to remain standing. Salvage logging should be limited in such areas if this species is present. It should be noted that this species requires periodic forest disturbances such as fire to persist in viable numbers.

Chapter 4 Monitoring and Evaluation: Monitoring is a key element to predicting the effects of a planned action and will have a significant bearing on the success of a forest planning effort. The Forest Service is encouraged to further expand this chapter to ensure that uncertainties associated with standards and guidelines are adequately addressed.

National Rivers Inventory

The National Rivers Inventory (NRI) is a listing of more than 3,400 free-flowing river segments in the United States that are believed to possess one or more "outstandingly remarkable" natural or cultural values judged to be of more than local or regional significance. The Big Fork River in

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the Chippewa National Forest is listed on the NRI, as are the St. Louis, Brule, Cloquet, Pigeon, Vermilion, and Temperance Rivers in the Superior National Forest. Under a 1979 Presidential directive and related Council on Environmental Quality procedures, all Federal agencies must seek to avoid or mitigate actions that would adversely affect one or more NRI segments.

Section 5(d) of the National Wild and Scenic Rivers Act (16 U.S.C. 1271-1287) requires that "In all planning for the use and development of water and related land resources, consideration shall be given by all Federal agencies involved to potential national wild, scenic and recreational river areas." Additionally, the 1979 Presidential directive requires each Federal agency, as part of its normal planning and environmental review processes, to take care to avoid or mitigate adverse effects on rivers identified in the NRI compiled by the National Park Service (NPS). Adverse effects on NRI rivers include the destruction or alteration of all or part of the free-flowing nature of the river; introduction of visual, audible, or other sensory intrusions which are out of character with the river or alter its setting; and deterioration of water quality. Further, all agencies are required to consult with the NPS prior to taking actions which could effectively foreclose wild, scenic, or recreational status for rivers on the inventory.

Under these criteria, we believe the proposed action could have an adverse effect on the natural, cultural, and recreational values of the inventory river segments in the Superior and Chippewa National Forests. All of the proposed alternatives in the EIS have elements that provide for actions that could effect the outstanding remarkable values on the listed rivers. These actions include construction of new forest roads, expanded timber and pulpwood clear cutting, expanded authorized off-road vehicle use, expanded water recreational access, and timber harvesting in riparian areas.

Although dismissed as an "Issue Not Addressed in Detail" in section 1.6, implementing new forest plans under all the proposed alternatives has the potential for having broad effects on the outstanding remarkable values of the NRI rivers in the two forests. We believe the DEIS inadequately addresses the effects of the proposed alternatives on the NRI listed rivers on the Superior and Chippewa National Forests. We strongly encourage the Forest Service to evaluate the potential effects all alternatives would have on each NRI listed river and develop necessary mitigation.

National Scenic Trail System

The North Country National Scenic Trail (NST) was authorized by Congressional and Presidential action on March 5, 1980. Currently, the proposed trail includes routes through the Chippewa National Forest, and as a result of the northeastern Minnesota route assessment, a recommended route traversing the Superior NF. This information should be included in the "existing condition" information and in the elements common to all alternatives. The effects of the alternatives on these planned NST routes through both forests should be discussed in the environmental consequences section and in the cumulative effects section as well.

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Text specifying that the North Country NST "will be administered and managed as a path whose use is primarily for hiking and backpacking" should be included. This language is taken directly from desired future condition statement in the November 18, 1999, Memorandum of Understanding (MOU) between the Forest Service, NPS, and the North Country Trail Association.

The North Country NST should be managed for very high or high scenic integrity. Text stating this should be in the plans.

We encourage the Forest Service to adopt a general management policy that areas and trails be "closed unless posted open to a particular use."

Due to the current emphasis on motorized use on state lands in Minnesota, we believe the national forests can and should provide more space for non-motorized recreational uses. We encourage the Forest Service to develop a final selected alternative for management of the forests that includes a greater emphasis on providing and protecting recreational trails for non-motorized uses. We believe such an emphasis would be the best way to meet the needs of people for "diverse recreational experiences in a natural setting."

Text restricting or limiting the use of common trailheads between motorized and non-motorized users should be included. Common trailheads invite illegal motorized use of trails closed to such use.

Text should be included in the plans specifically acknowledging the acceptability of maintenance of NSTs within designated wilderness areas and that such maintenance is allowed.

Monitoring conflicts between hikers and other non-motorized users on the North Country NST should be a part of monitoring activities within the forests. Any such conflicts should be resolved in favor of hikers and backpackers over other users on the trail. Without such a proactive approach, studies have shown that as other uses increase, hikers and backpackers will over time, be displaced from the trail. Additionally, impacts from illegal motorized use should be remedied as quickly as possible; mere signs of the presence of motorized vehicles are often enough to displace hikers from a trail.

Additions to Appendix I

The following documents guide the management of Federal agencies having responsibilities for the North Country NST or NSTs in general and should be added to Appendix I:

1. Executive Order 13195, Trails for America in the 21st Century, January 18, 2001.
2. Memorandum of Understanding, concerning the administration and management of the North Country NST, between the NPS, the Forest Service, and the North Country Trail Association.

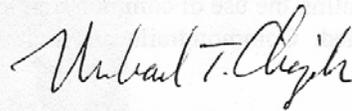
Association, which was signed by the Eastern Regional Forester on November 18, 1999.

3. Memorandum of Understanding for the Administration and Management of National Historic and NSTs among the Bureau of Land Management, NPS, Forest Service, Federal Highway Administration, and the National Endowment for the Arts, dated January 19, 2001.

The Department has a continuing interest in working with the Forest Service to ensure that project impacts to resources of concern to the Department are adequately addressed. For matters related to fish and wildlife resources and federally listed threatened and endangered species, please continue to coordinate with Mr. Dan Stinnett, Field Supervisor, Twin Cities Field Office, U.S. Fish and Wildlife Service, 4101 East 80th Street, Bloomington, MN 55425-1665, telephone (612) 725-3548 ext. 201. For matters related to National Scenic Rivers Inventory and the National Scenic Trails System, please contact Ms. Sue Jennings, Environmental Compliance Specialist, National Park Service, Jackson Street, Omaha, NE 68102, telephone (402) 221-3493.

We appreciate the opportunity to provide these comments.

Sincerely,



Michael T. Chezik
Regional Environmental Officer

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**PUBLIC COMMENT ON THE PROPOSED FOREST PLANS
FOR THE CHIPPEWA AND SUPERIOR NATIONAL FORESTS**

**by
HONORABLE JAMES L. OBERSTAR, M.C.**

The U.S. Forest Service preferred Alternative (Alternative E) Forest Plan would reduce timber harvest and weaken the forest industry and area economy. My concern for the preferred alternative originates from the lack of regard for the local economy. I represent a natural resource based economy that has been forced to work within a competitive world market for forest and paper products. It is important to point out, with sound forest management both industry and environmental groups can utilize our national forests.

Over 55,000 Minnesota workers derive all or part of their earnings from the forest products industry. The industry is one of the largest employers in the state with operations based on modern forestry practices, better use of resources, advanced technology and market needs. For every job at the mill, 1.5 jobs are created indirectly in local and regional economies. Overall, the industry's total impact on Minnesota's economy is more than \$6.9 billion in direct production and value-added production by secondary manufacturing.

Under the preferred old-growth plan (Alternative E), the timber harvest would fall from 70 million to 50 million board feet per year in the Chippewa National Forest and from 100 million to 82 million board feet per year in the Superior National Forest. I support an alternative plan (Alternative Plan C) where there is a slight increase in timber harvesting, raising the harvest to 91 million board feet in the Chippewa National Forest and 150 million board feet in the Superior National Forest. An estimated loss of nearly 200 jobs annually in both the Chippewa and Superior National Forests and an estimated decline of nearly \$1 million in timber sale revenue in each forest. Spread to the larger community, these losses could result in reduction of

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about \$10 million in annual economic impact.

Timber sales have a significant economic impact on local, regional, and state economies. Over the past decade, these programs have generated timber sale revenues over \$85,000,000, generated \$450,000,000 of economic activity, and provided over 7,950 jobs. Minnesota has a Permanent School Trust Fund program in which profits from these lands are deposited into a trust and used to help fund our schools. The amount of timber sold from public agencies has decreased over the past decade, pushing more harvesting activity onto private lands. The most significant decreases are from state and federal lands. Unrealized regional and local economic activity from the reductions of planned harvest levels on public land is estimated at \$83 million and 1,450 jobs annually. As our society continues to demand and use forest products, we must rely more on imported wood and wood products from countries that do not always adhere to the high standards of forest management that we do in the United States and Minnesota. Restrictions on timber sales have contributed to a 230% increase in wood prices over the past 10 years.

An increase in harvesting Minnesota's forest provides wood for the products we use every day. Harvesting our forest also adds diversity to the lands. It also provides a younger forest, which serves as an important habitat for many wildlife species whose populations are in decline in older forests (Ruffed grouse, Deer, Woodcock and Golden Wing Warbler). Young forests grow so quickly that the dense young forest habitats require by many wildlife species are available only for a short period of time. The continued establishment of young forest habitats through commercial forest management practices is essential to the long-term health of Minnesota's forest wildlife. In the past, allowing over-mature forests to succumb to such things as wildfire helped to create young forests. This is no longer feasible due to efforts to prevent, suppress and fight forest fires.

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Aspen is currently the most abundant deciduous tree in Minnesota. Its regeneration capabilities, dense regrowth characteristics and short life span offer tremendous opportunities to create and maintain young forests. Harvesting an aspen site is visually dramatic and often misunderstood. However, cutting aspen is both ecologically appropriate and biologically important. Aspen trees are shade-intolerant, which means they successfully reproduce and grow only in direct sunlight. After a mature stand is removed, young aspens sprout by the thousands from buds along live root systems. Through scientific forest management, we can have healthy, productive forests that are biologically diverse and still provide recreation, habitat for wildlife, as well as products we use every day. All of which are reasons the forest industry is working to make our forests a better place.

The U.S. Forest Service's preferred plan would negatively impact an already sluggish local economy. With good forest management we can all enjoy the heritage of our national forests while using spurring our natural resource based economy.

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MEMORANDUM FOR NGB-ARE-C (MAJ Steve Morgan)

SUBJECT: Review of the Proposed Forest Plans for the Chippewa National Forest and Superior National Forests, Minnesota.

1. Reference:

- a. Proposed Forest Plan for the Chippewa National Forest. US Department of Agriculture Forest Service. April 2003.
- b. Proposed Forest Plan for the Superior National Forest. US Department of Agriculture Forest Service. April 2003.
- c. Draft Environmental Impact Statement for Forest Plan Revision Chippewa National Forest, Superior National Forest. April 2003.
- d. Master Agreement Between Department of Defense and Department of Agriculture Concerning the Use of National Forest System Lands for Military Activity, 30 September 1988.

2. Background: The Chippewa National Forest consists of 666,000 acres in north-central Minnesota. The Superior National Forest consists of three million acres in northeastern Minnesota including the Boundary Waters Canoe Area Wilderness. Comments on the Proposed Forest Plans are due no later than 11 August 2003. To date, the Army National Guard has not used either national forest for military training according to the Forest Service's special use permit database. Access for military training is allowed on National Forest System lands via a special use permit process and through referenced.

3. I have reviewed references a, b, and c. Although neither of the proposed forest plans state that military training is an approved activity under a special use permit, neither of the plans preclude military activity. Both proposed forest plans state that most special uses can be accommodated on the vast majority of management areas on the forests. An executive summary of reference c states that the management direction for special uses will be carried forward from the amended 1986 Forest Plans to the revised Forest Plans. Thus, little or no change is expected as relates to the special use permit process.

- a. Recommend NGB-ARE-C comment on both proposed forest plans stating the military's need of accessing these national forests for military training and recommending the following two additions to the proposed plans.
- b. Recommend adding a special uses objective (0-SU-6) to each proposed plan in chapter 2; page 2-27 in the Chippewa Plan and page 2-28 in the Superior Plan. Suggested wording "Allow access to national forest lands for military training consistent with Forest Plan Direction and the Master Agreement Between Department of Defense and Department of Agriculture Concerning the Use of National Forest System Lands for Military Activity, 30 September 1988."
- c. Recommend adding the Master Agreement Between Department of Defense and Department of Agriculture Concerning the Use of National Forest System Lands for Military Activity, 30 September 1988 to Appendix I (page I-5, Agreements and Memorandums of Understanding) of the Draft Environmental Impact Statement.

POC is undersigned at 703-607-9987.

Don C. Dagnan
Environmental Liaison
NGB-ARE-C



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 5
 77 WEST JACKSON BOULEVARD
 CHICAGO, IL 60604-3590

SEP 11 2003

REPLY TO THE ATTENTION OF:

B-19J

Tonya Struecker, Planning Assistant
 USDA Forest Service
 Forest Plan Revision Team
 Chippewa National Forest
 200 Ash Avenue, NW
 Cass Lake, MN 56633-8929

RE: Draft Environmental Impact Statement and the Proposed Forest Plans for the Chippewa and Superior National Forests, Minnesota. CEQ # 030196

Dear Ms. Struecker:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, et. seq., and Section 309 of the Clean Air Act, the Region 5 office of the U.S. Environmental Protection Agency (U.S. EPA) has reviewed the Draft Environmental Impact Statement (DEIS) and the Proposed Forest Plans (PFP) for the Chippewa and Superior National Forests. We are pleased to have the opportunity to add U.S. EPA's views and suggestions to the planning effort for the National Forests. This package summarizes our comments on the DEIS and PFPs. Attached to this letter are our detailed comments, and a description of U.S. EPA's rating system for DEISs. The CEQ# for the DEIS is #030196.

The DEIS is the product of a formal USFS planning effort that began in 1997. The combined Chippewa/Superior forest plan, which revises the plan approved in 1986, will guide the next ten to fifteen years of forest management. The two National Forests occupy almost 3 million acres in northern Minnesota, with the bulk of forest land (approximately 2.2 million acres) being located on the Superior National Forest, which is bordered on two sides by Ontario, Canada and Lake Superior. In addition to being required by the National Forest Management Act, the proposed plan is necessary to address changes in:

- Forest resource conditions due to infestations, fuel build-ups, and climatic conditions,
- Forest user/public demands for recreation and timber,
- New management approaches,
- New data and information on forest ecosystems, and
- Shifts in Forest Service policy on the national level.

Several issues important to forest planning were identified by the USFS to help focus the planning process. They are: forest vegetation, wildlife habitat, timber, the role of fire, economic

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and social sustainability, and watershed health. The six action alternatives that were developed for the DEIS address these issues in a variety of ways, but are designed so that each would meet the Purpose and Need described in Section 1.3. The Preferred Alternative (PA), Alternative E, places an emphasis on a “diverse economic base in local communities” by promoting timber and other forest commodities, tourism, recreational opportunities, and scenic interests.

By averaging the expected outcomes of all of the alternatives, we have characterized Alternative E, the preferred alternative, as follows:

- Recreation: more new snowmobile trails and roaded natural and rural areas, less emphasis on semi-primitive recreation areas, allows cross-country use of all-terrain vehicles (ATVs) for trapping and hunting, and allows development of the maximum number of proposed water access sites.
- Vegetation Management: a decrease in maximum volumes of timber to be extracted from the forests, a moderate reduction of and lower use of prescribed fire to reduce fuel loading and for ecosystem disturbance, slightly higher proportions of clearcutting on the Superior, fewer management area acres contributing to Chippewa old-growth, fewer acres designated as potential wilderness, no special management complexes, and fewer potential Research Natural Areas.
- Economic: higher numbers of jobs created and amounts of labor income.
- Roads: fewer level 1 roads on the Chippewa and more level 1 roads on the Superior NF.

We rated Alternative E, **EC-2, Environmental Concerns-Insufficient Information**. The No-Action Alternative and the other five action alternatives have not been rated, but some are referenced in our detailed comments (enclosed). Additional information on watershed protection, deer herd management and invasive species management should be included in the final EIS in order to adequately assess the environmental impacts of the forest plan. We recommend that the USFS consider a hybrid alternative, as follows:

Preferred Alternative (E) should be expanded in scope, incorporating elements of other action alternatives more intensively, namely, Alternative D’s transition from timber production toward ecological succession and restoration; Alternative B’s restoration of forest types and protection of unique resources with less emphasis on commercial management; and some of Alternative F’s goals for achieving the Range of Natural Variability.

We also have the following environmental concerns:

1. That without adequate deer herd management and invasive species management, the forests will suffer damage that should be avoided or minimized, and
2. That the forest should include further measures for watershed protection to enhance surface water quality on the forests.

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The Superior National Forest provides a national model for wilderness management, with its protective maintenance of the Boundary Waters Canoe Area Wilderness, a popular destination for tourism. However, despite the large size of the wilderness reserve, development and fragmentation pressures exist in the southern boreal forest ecosystem on private lands around the national forest edges. These pressures increase the importance of federal efforts to protect and maintain large-scale plant and animal diversity. On that basis, U.S. EPA believes that long-term management plans of the National Forests should place the strongest emphasis on ecosystem restoration, maintenance, and protection. Also, although we understand that the USFS must strive to provide economic and recreational opportunities to meet multiple-use goals and to satisfy growing demands, we believe that putting conservation and maintenance of resources first is the best way to ensure the future abundance of forest resources and continued availability of recreational opportunities in natural settings.

Thank you for the opportunity to comment on the DEIS. We would like to meet with the USFS to discuss our concerns prior to the issuance of the Final EIS and Record of Decision. We look forward to working with you on the forest plan revision. Please contact Rosalyn Johnson of my staff at (312) 353-5692 to set up a time to meet.

Sincerely,



Kenneth A. Westlake, Chief
Environmental Planning and Evaluation Branch
Office of Strategic Environmental Analysis

Enclosures (5): Summary of Ratings
 Detailed Comments
 MPCA Maps of Impaired Waters in the Vicinity of the National Forests

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SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION**Environmental Impact of the Action**LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact StatementCategory 1-Adequate

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment

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**USEPA Comments on the Draft Environmental Impact Statement for a Forest Plan Revision:
Chippewa and Superior National Forests. September 2003**

Detailed Comments

Selecting a Final Preferred Alternative

Based on the "Comparison of Alternatives" in Section 2.5, Figures 2.8 through 2.11, USEPA recommends that combining elements of four of the action alternatives (B, D, F, and E). Such a hybrid alternative would follow the multiple-use mandate while prioritizing forest ecology, restoration, and protection over forest recreation and resource extraction. This strategy should not preclude forest uses (e.g., timber production, ATV use, hunting and fishing), but would direct more effort toward the work of restoring and preserving natural communities and forest species. Although we understand that the USFS must strive to provide economic and recreational opportunities to meet multiple-use goals and to satisfy growing demands, we believe that focusing on conservation and maintenance of resources in the long-term is the best way to ensure the future abundance of forest resources and continued availability of recreational opportunities in natural settings.

Elements of this hybrid alternative that are most important for the planning period are:

- Range of Natural Variability (RNV) Goals: As much as possible over the life of the plan (i.e., decade 1 - 1.5) encourage ecological sustainability by bringing both under-represented and superabundant forest types (e.g. aspen conversion to other types) and age classes closer to their historic RNV as defined by the Minnesota Forest Resource Council's panel of experts referenced in Appendix G. This effort will be strengthened by the USFS ongoing commitment to coordinate and interact with other area landowners (p. 3.2-44) in planning forest management.
- Stand Diversity: As much as possible over the life of the plan, increase resiliency of stands to stochastic events (i.e., blowdowns, wildfires, ice storms, etc.) by utilizing management methods that increase stand diversity in a balance with clearcutting (which tends to simplify stands, as noted on p.3-2-35).
- Interior Forest Habitat and Management Induced Edge: Encourage increases in interior forest as in Alternatives B, D, and F (see Section 3.2), and minimize creation of edge as much as possible over the 15 year life of the plan.
- Deer herd: Damage studies and management should be incorporated into the PFPs.
- Invasive Species: Prevention and reduction strategies should be included in the PFPs.

Collaboration in Deer Management for Forest Health

U.S. EPA shares the concern noted in Section 3.3.6.4 that, "...at high population levels, white-tailed deer can cause major changes in the composition and structure of forest communities by browsing shrubs and tree seedlings, and grazing understory forbs." The section references studies that have shown the adverse impacts of high deer populations in the area, including problems with floral regeneration and survival of rare species (p. 3.3.6-27) . Realizing that the

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states hold primary responsibility for managing the state's deer populations, USEPA recommends that the USFS be as aggressive as possible in collecting and sharing data on deer damage levels, and helping the State of Minnesota to set deer herd management goals that are more protective of forest resources.

Since CEQ's guidance under 20 CFR 1502.14 states that agencies shall, ..."Include reasonable alternatives not within the jurisdiction of the lead agency," we recommend that the USFS include collection of deer damage data in its long-term monitoring goals, and to carry the results into coordination efforts with the State of Minnesota. We believe that **not** planning toward deer herd reduction over the life of the forest plan would allow adverse impacts to the forest ecosystem to continue and to become significant.

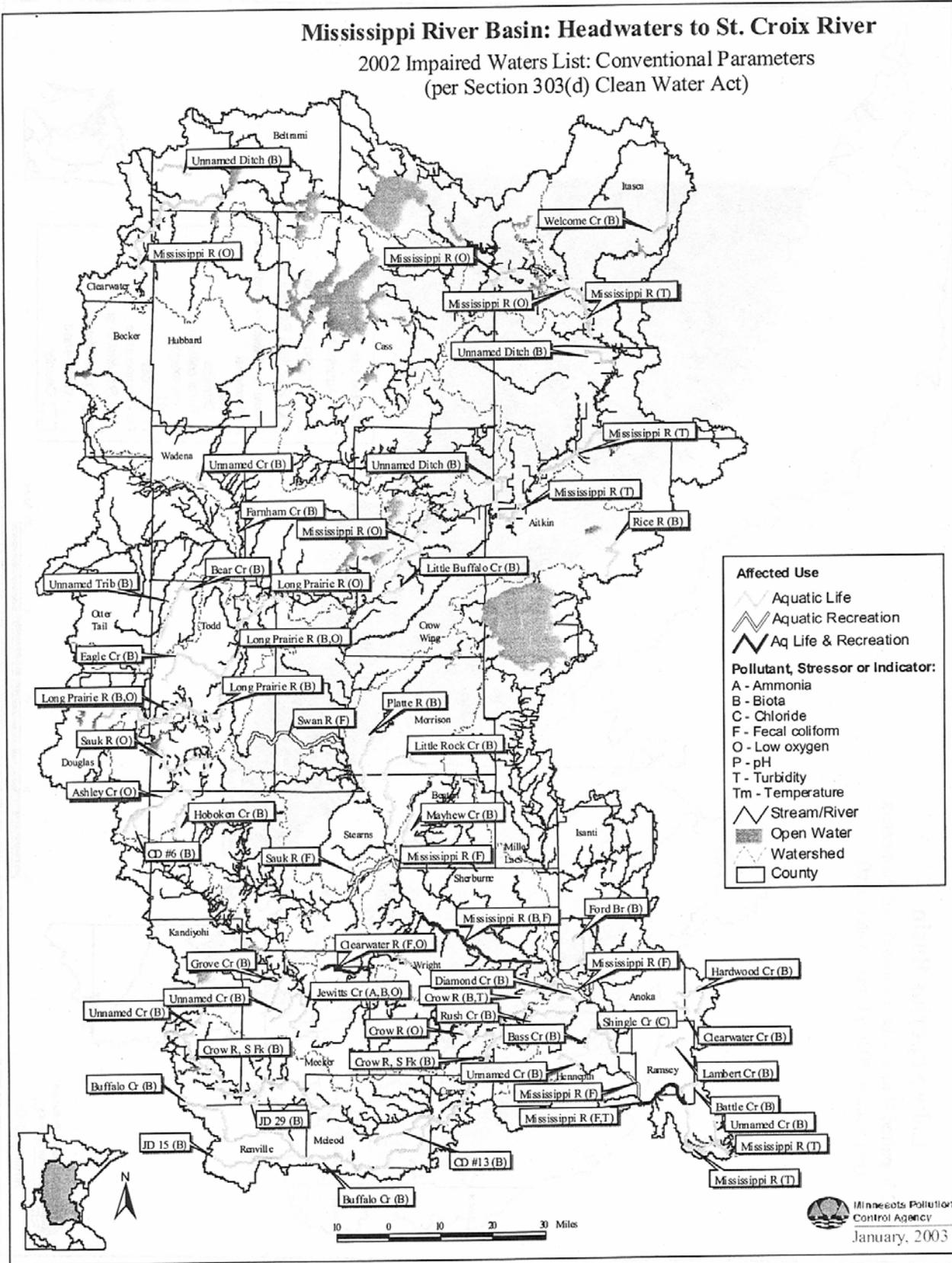
Water Quality

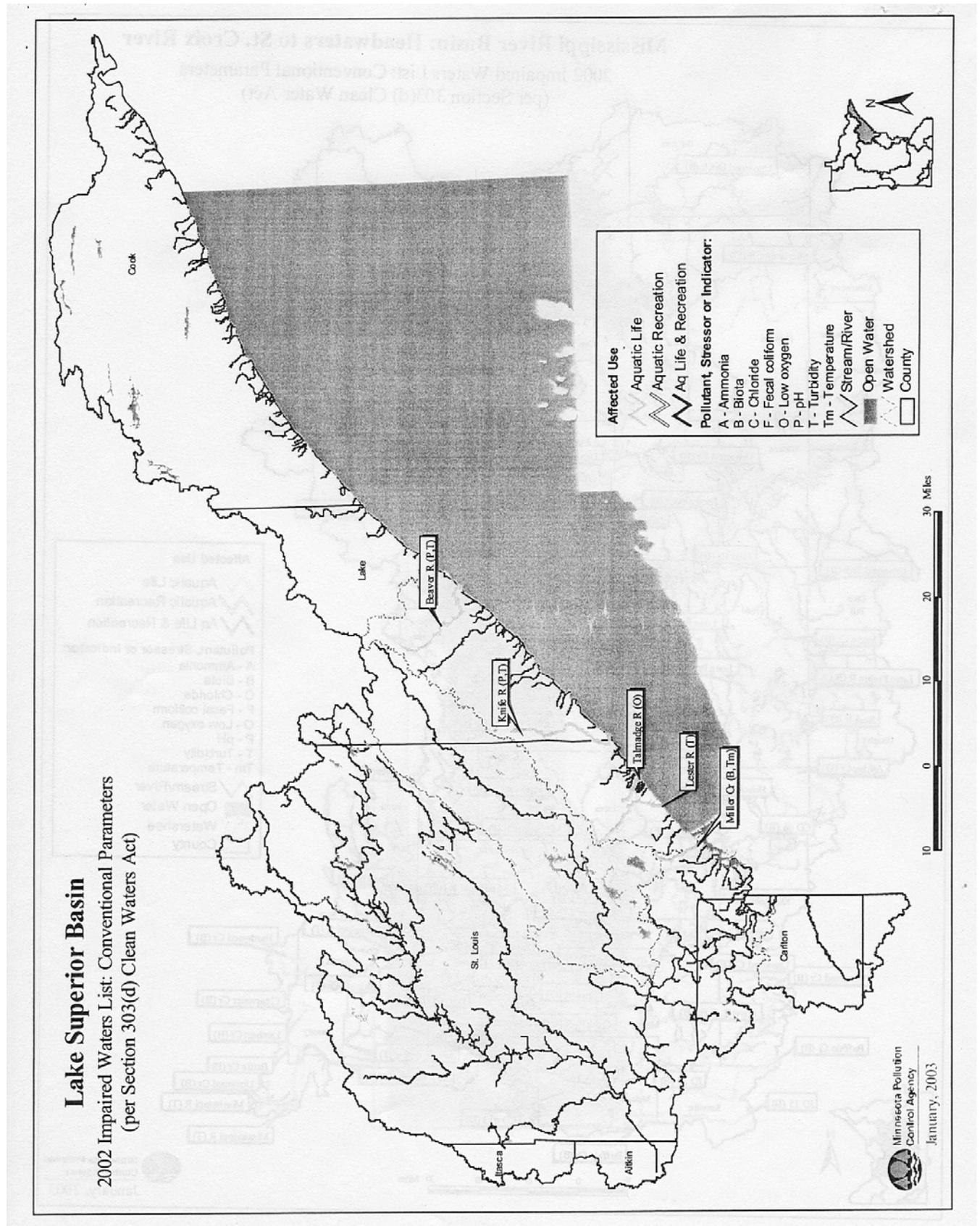
In the planning process for the Proposed Forest Plans, the USFS has the opportunity to use Minnesota's Clean Water Act Section 303(d) list of impaired waters to assist in setting water quality standards and guidelines. We recommend incorporating the impaired waters listed by the State into the cumulative effects analysis, and using the impaired waters list to help focus watershed management efforts to improve overall water quality. We've attached three maps of watersheds in the vicinity of the Chippewa and Superior National Forests. These maps, and other information on impaired waters are available on the Minnesota Pollution Control Agency website. Please contact the State or U.S. EPA to find out the status of any proposed total maximum daily load (TMDL) allocations for these waterbodies.

We also recommended that the USFS partner with state and local agencies to assist with restoration of these waters, particularly those water bodies where the Forest Service may also be a contributor to the impairment or is a significant land-holder in these watersheds. U.S. EPA requests that the Forest Service re-examine specific management prescriptions in these watersheds to determine incompatibilities with these resource protection objectives.

Invasive Species

The Non- Native Invasive Species section of the DEIS does a fine job of describing the possible risks of invasion and steps that might be taken for control. Because of the serious threats to biodiversity that are involved, we encourage the USFS to carry this analysis and its conclusions forward into the Chippewa and Superior National Forest Plan Revisions. The Chequamegon-Nicolet National Forest, for example, has proposed a new forest biodiversity goal to reduce those species. We recommend including such a goal in the PFPs, as well as standards and guidelines in the plans for preventing (where possible) the introduction and reducing the spread of NNIS.

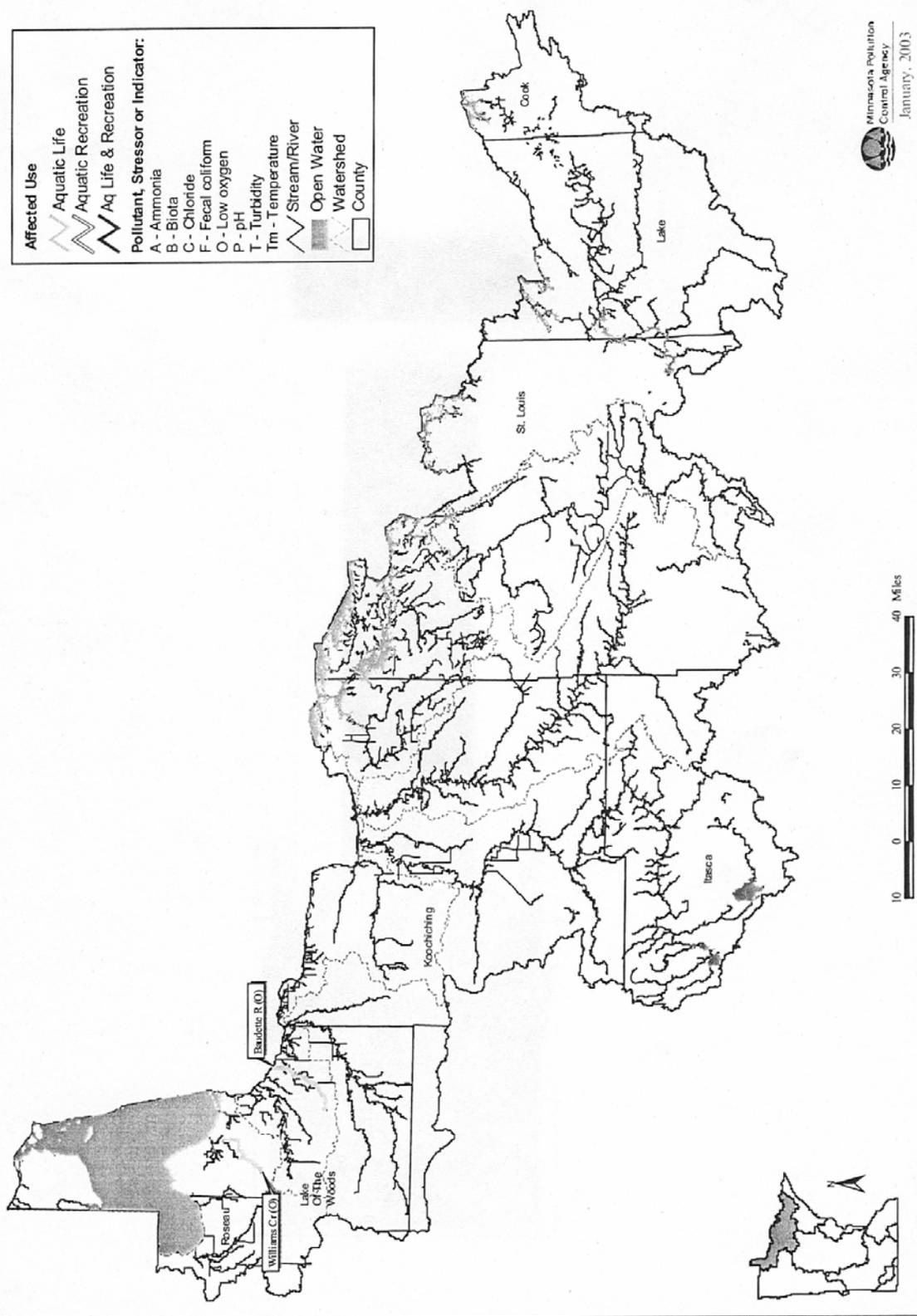




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Rainy River Basin
 2002 Impaired Waters List: Conventional Parameters
 (per Section 303(d) Clean Water Act)

Affected Use	
	Aquatic Life
	Aquatic Recreation
	Aq Life & Recreation
Pollutant, Stressor or Indicator:	
A - Ammonia	
B - Biota	
C - Chloride	
F - Fecal coliform	
O - Low oxygen	
P - pH	
T - Turbidity	
Tm - Temperature	
	Stream/River
	Open Water
	Watershed
	County



Minnesota Pollution Control Agency
 January, 2003

GIL GUTKNECHT
1ST DISTRICT, MINNESOTA



Congress of the United States
House of Representatives
Washington, DC 20515-2301

September 11, 2003

Forest Plan Revision
Chippewa National Forest
200 Ash Avenue Northwest
Cass Lake, Minnesota 56633

Dear Sir or Madam:

Recently, I spent time touring Minnesota's National Forests and meeting with representatives of local forest industries. I was impressed with the scale and beauty of the region's public and private forest resources, and the resilience and determination of the good folks involved in managing them.

While I found this visit informative and productive, I was also disturbed by some of the information relayed to me by public and private foresters, particularly relating to the revision of the forest management plans for the Superior and Chippewa National Forests. Over the last decade, the Forest Service has taken an increasingly passive approach to its management responsibilities. The Forest Service has failed to actively manage its forests, harvesting less than half the planned timber volume in fiscal year 2002. All indications are that even fewer acres will be actively managed this fiscal year. Worst of all, the proposed revision to the forest plans for the Superior and Chippewa National Forests would reduce the area available for management by over 30% and, in all likelihood, leave these forests far more susceptible to insect infestations and disease. If the Forest Service adopts the Preferred Alternative E as proposed, the current course of declining management will threaten the health of all of Minnesota's forests.

Estimates indicate that more than 1.1 million acres of Minnesota's two National Forests are, or are approaching, over-mature. At the same time, timber harvests on our National Forests have declined by more than 60 percent over the last 12 years. The Preferred Alternative E is severely flawed for a number of reasons; it adopts arbitrary visual guidelines that conflict with state-wide guidelines developed in cooperation with the Forest Service; it disproportionately favors prescribed burns, even where commercial forest management could achieve the same ecological results; and it favors creation of habitat for certain species without considering the impact on important game species such as ruffed grouse and whitetail deer. In addition, the Forest Service appears to have arbitrarily selected species that prefer older forests to guide its management, while ignoring critically imperiled non-game species that require young forest habitat.

Most frustrating is the fact that the Forest Service appears bent on adopting this passive approach in spite of the fact that scientific evidence suggests that a more active approach will have far

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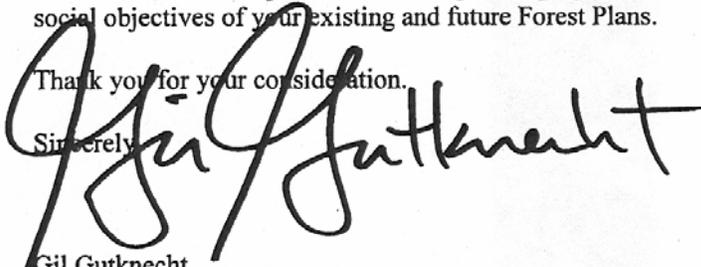
greater ecological, economic, and social benefits. The plan takes no notice of the economic impact on the local timber industry, and appears to ignore the fact that 43 percent of public use of the National Forests is associated with hunting and fishing. Thirteen wildlife conservation groups, including the National Wild Turkey Federation, Ducks Unlimited, and the Ruffed Grouse Society, recently wrote the Forest Service seeking major revisions to the Preferred Alternative E.

As you revise the Forest Plan, I strongly urge you to consider adopting Alternative C, which will do more to create valuable habitat, sustain the local economy, and produce the wildlife experiences which most visitors to these forests seek.

In addition, I urge you to take advantage of the new administrative tools, including Categorical Exclusions, to accomplish forest management projects that address the ecological, economic, and social objectives of your existing and future Forest Plans.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Gil Gutknecht". The signature is written in a cursive style with large, sweeping loops.

Gil Gutknecht
Member of Congress