

Appendix A Responses to Initial Scoping

Commenter number corresponds to Respondent List.

comment number	Commenter	Where comment is addressed in DEIS	COMMENT
1	30	Comment Noted	I don't see much diversity if all we have in NFs are mature maple and conifers.
2	47	Section 2.4.3	Some of the BCPL lands are of natural area quality and are located next to CNNF LAD sites which contain similar natural features. The BCPL has initiated a biotic inventory to identify and help determine future management goals for our highest quality sites We look
3	45	Section 3.2	The FS needs to consult the Biosphere Suitability Factors in the SWAN Potential Northwood Biosphere Reserve Map at www.superiorwild.org and available on ArcExplorer. The map indicates that compartments 147007, 148002, 148024, 148004, 148025152005, 148010, 152008 and 149001 have a high suitability ranking for restoration and should not be cut for any other reason.
4	22	Section 3.2	The border area is known to be an area of relatively new wolf activity with numerous species moving back and forth from Wisconsin to Michigan across the Brule River and up and down it. "Wisconsin is more fragmented with roads, towns and open agricultural land than is the Upper Peninsula of Michigan. To maintain a wolf pack in Wisconsin, it is important to provide forested habitat linkages and corridors for wolf dispersal to and from Minnesota to Michigan, as well as within Wisconsin. Forested blocks of land that connect wolf habitats across Wisconsin should be maintained (from WI Wolf Mgmt Plan by the Wisconsin Wolf Advisory Committee of the WI DNR). This proposal for over 7,000 acres of logging will further fragment this corridor, therefore impacting the species dependent on this habitat.
5	39	Alternative 3	We generally support attempts to re-establish conifers such as white pine, white cedar and hemlock. In such areas that have an aspen overstory, the FS should promote conifer regeneration through a process that relies substantially upon natural succession. Not only would this begin a process to improve functional diversity with the forest, but also it would allow our state to capture an underrepresented ecosystem of old growth aspen.
6	42	Section 3.6	(For wild and scenic river corridor) A no-harvest buffer of 150 feet is commendable. Actions should also consider lighter harvest farther from the river (such as no clearcuts within 400 feet or more). The riparian effects of rivers extends much farther than 150 feet.
7	19	Section 3.6	US EPA supports the USFS efforts at restoration of forest structure along the rivers in the project area. Along certain stretches of the rivers, riverbed restoration efforts may also be needed to return to conditions that are supportive of northern WI's native aquatic diversity. We encourage the USFS on the project, district and forest levels, to work cooperatively with other agencies (e.g., US Army
8	45	Section 2.4.3	Alternative ways to meet goals: go to a longer rotation time for hardwoods, reduce aspen and birch regeneration, eliminate salvage sales after blowdowns, use controlled burns to clear excessive groundcover where possible, reduce roads and invasive species. The overabundance of deer prevent hemlock forests from regenerating. Increase hunter harvest of these varmints.
9	53	Section 3.2	The Lake States Lumber Assoc. does not believe there is any credible scientific evidence of within forest fragmentation. Fragmentation has been scientifically documented as a concern in urban and highly agricultural areas. That concern does not transfer to fragmentation within a forest. Forests that are harvested and regenerated to a forest condition are quite different from fragmentation caused by forest land conversion. This forest is naturally fragmented by swamps, lakes and natural openings. Species have adapted to these conditions on the Lake States Forests over time.. Negative references to forest or habitat fragmentation due to

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10	22	Section 3.2	Please acknowledge that the reason why so little new growth of white pine, hemlock, and cedar is around is due to the inflation of aspen. The most significant changes occurring in the northern forests as a result of intensive logging for the past 150 years include: 1) the elimination of natural white and red pine and hemlock; 2) the conversion of northern hardwoods, spruce-fir forests and pineries to aspen-birch types; 3) the fragmentation of contiguous interior forest canopy; 4) the creation of more, smaller and simpler forest
11	45	Section 3.2 and 3.3	What is the effect of this harvest on old growth indicator species (tree lichens, pine martens, goshawks, Neotropical migrants, ground
12	51	Section 3.2	Humans on the landscape have influenced the natural forest inferred for more than 8,000 years. Reconstruction of presumed "historical" vegetative conditions are inappropriate for use as a foundation of current land management planning. While historic information can provide helpful insight into what may have existed in the past, it is inherently imprecise and does not adequately represent the range of change that has evolved over time in response to dynamic disturbance regimes. Recent work by Mladenoff has found inconsistencies and biases in land survey notes baseboard for past efforts to reconstruct historic forests and mentioned in this proposal.
13	51	Section 3.1 and 3.2	The EIS needs to demonstrate quite properly the importance of maintaining a distribution of age-classes across the landscape. Landscape diversity needs to include all parts of the forest ecological spectrum. There are ecological and biological benefits to having pure stands of young forest species. Clearly low within-stand diversity is not always a problem to rectify; it is a natural condition within most pioneer communities including aspen and jack pine.
14	19	Section 3.2	Much of the Canadian Thistle observed during the field visit was located along equipment trails, permanent roads, and temporary roads during the field visit was located along equipment trails, permanent roads, and temporary roads that had been closed and bermed. In the future, the species could be further spread by equipment that moves into previously unaffected areas, or by road surfacing material that contains noxious weed seeds. US EPA supports a proactive approach to invasive species mgmt. that avoids unnecessary disturbance, encourages elimination of existing patches, carefully selects roadbed materials to avoid introduction of weed seeds, uses of noxious weed-free equipment, and that monitors disturbed areas for new establishment of noxious weed species.
15	19	Section 3.2	We support the USFS plan to continue to emphasize native plant and animal species and communities by planting native species in preference to exotic species; by planting non-aggressive, easily-controlled species when necessary for erosion control or other needs; and by removing exotic plant and animal species in areas where they are becoming established. Need to comply with Executive Order 13112 on Invasive Species. Aspects of forest management projects that could cause or promote the introduction or spread of invasive species should not be authorized, funded or carried out unless it can be established that potential benefits of the project clearly outweigh the harm caused by the invasive species.
16	19	Comment Noted	In order to encourage management activity around invasive species, the USFS might consider highlighting competitive funding programs to local researchers, learning institutions, and environmental groups. Grant and funding information for invasive species mgmt. is available on the internet.
17	37	Section 3.1 and 3.6	Concerned about clearcutting, there was not compelling evidence to convince him that it's necessary and it's detrimental to wildlife habitat. Particularly concerned about clearcutting along private property that may adversely affect property values. It's a visual eyesore and destruction of habitat.
18	37	Section 3.3 and 3.6	
19	40	Comment Noted	
20	1	Comment Noted	Given the scope of this project in conjunction with the other four proposals for the CNNF, providing adequate review and input is difficult in the time allotted. It would be helpful to receive a timeline for the five major projects being conducted on the Forest. Additionally, it would be helpful to understand how the Forest will be operating in the interim, when the existing forest plan expires in August and before a revised plan comes on line.
21	22	Section 3.1.4	The scoping letter states this sale will not prejudice any future Forest Plan. (This statement was not in the proposal, however, figured this would need to be addressed anyway). Please provide how this is so. Since citizens have not had an opportunity to see the alternatives for the new forest plan, it is difficult for us to understand how over 7,000 acres of logging will not effectively eliminate future alternatives for this area. IF the Forest Plan alternatives are available, then please provide those in the next environmental document for this project to confirm your statement of no prejudice. This proposal eliminates opportunities of restoration, unless you have new data and information. IF you do ,then you need to amend the LRMP.

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22	22	Section 3.1.4 and 1.6	SWAN is concerned about the failure of the District to incorporate new science and data since the 1986 LRMP. Specifically, this is a concerns since it has been five years since the NOI to revise the plan. When the Forest Supervisor remanded the 1986 Plan back to the Nicolet in 1990, he specifically required the Forest to amend the Plan to address viability concerns. The Forest chose not to do this. SWAN contends this was an arbitrary and capricious decision on August 1, 1995, and contends that the failure to present a revised plan after six years is arbitrary and capricious as well. Failure to amend the Plan during the past 15 years constitutes an abrogation of the Forest's duty under the NFMA and a complete abrogation of the remand back in 1990. Forest Plans are living documents subject to amendment and supplement throughout the designated time-period of its existence. How has the Eagle River-Florence district determined what new data is relevant and what is not? Where is this new data, and can SWAN obtain a list of all new data and policies to which the District refers?
23	39	Section 3.1.4	The Howell Project uses the Nicolet Forest Plan as a basis for action. Yet, the visioning process for the new CNNF plan is being schedule and the current plan is expected to expire in August 2001, which is possibly after the final decision for this project will be made. We must question whether it makes sense to use the current forest plan as the basis for such a large project that will continue into 2007. The management direction and the desired future condition will clearly be changed under the context of a combined CNNF Plan and the actions and effects from this project will clearly continue well beyond August 2001.
24	47	Section 2.4.3	Given the fact that your current forest plan will expire shortly, we urge you to consider the management practices listed below to maintain the full range of options for the next forest plan. Over the past five years, the Board of Commissioners of Public Lands has been actively engaged in the CNNF's forest plan revision process at a considerable time and expense to our agency. Representatives from the BCPL have submitted written comments and attended numerous planning hearings with the understanding that the Forest Service was making a good faith effort to solicit stakeholder concerns and finish the plan in a timely manner. The BCPL District Office staff would like to make greater efforts to co-manage our shared resources in the future, however, we are deeply concerned that the forest plan revision process has been diverted into a secondary priority. We urge you to finish the plan and implement any new project proposals under a revised forest plan using the new planning regulations. The purpose and need for the NWH project and any other major projects should be based upon an updated forest plan in which the BCPL District Office and many other participants have already
25	47	Comment Noted	As a stakeholder in the planning process, we believe that it is unfair to ask the public for comments, hold public hearings, produce a massive planning record, only to shelve the process to undertake expansive projects under a soon-to-be expired forest plan. By implementing the NWH plan as well as four other large projects, you may be limiting future plan revision options. Undertaking projects with the scope of the NWH proposal undermines the legitimacy of the Forest Plan Revision process.
26	47	Section 3.1.4	Some alternatives (of the Forest Plan Revision) should encompass several of the BCPL's best hemlock-hardwood tracts in the Alvin/Allen Creek Area as an Alternative Management Area. Is this option still going to be available after the implementation of the project?
27	1	Section 3.3 and Appendices F-1	It's important to survey for, and adjust the proposal as appropriate, several rare species known to inhabit the project area or areas nearby. A partial list of these includes: American marten, Fairy slipper, Little goblin moonwort, and Western Jacob's-ladder. Please discuss the survey data and explain how those data have been considered in developing alternatives. Also, note that certain rare species such as little goblin fern do not appear above ground every year, and thus several successive years of inventory effort are required to be assured that the species does not occur at a given site.
28	42	Section 3.3 and Appendices F-1	In the proposed harvest areas, Lee LeBlanc Audubon members have had sightings of wolf and marten. In addition, within the landscape, there are recent records of Canada lynx accumulated by the WI DNR. We would expect to see the needs of these and other species addressed in the EIS. Have adequate surveys been conducted for these species by experienced professionals so that management can specifically consider their needs?
29	53	Section 3.3 and Appendices F-1	Some who comment on other timber sales in the region have suggested that in every timber sale the Forest Service must conduct a biological evaluation that includes every possible Region 9 sensitive or threatened species. Such an extreme position is unfounded and not justified. Habitat can be used as a surrogate to determine presence of most species. Conducting a viability survey for species that have no habitat in the study area only serves to unnecessarily expand the workload of already overworked Forest Service personnel.
30	38	Section 2.7	We request that a no-harvest, restoration only alternative, one emphasizing natural disturbance processes, be developed and given fair and adequate consideration. It is the duty of the FS to develop reasonable alternatives that would exclude the harmful effects of commercial logging while encouraging natural recovery. The purpose and need of the project can be met more efficiently through means other than commercial timber harvest and those means must be given unbiased attention. Such a no-harvest, restoration alternative is not analogous to the no-action alternative.

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31	22	Section 3.1.4 a cumulative analysis of the impacts of all 5 EISs will be available in the Final EIS	Will the EIS consider the impacts of this sale and other proposed sales by the CNNF to the future Forest Plan? (lists all 5 EISs) Each of these sales will cut and remove sections of the forest from areas proposed by citizens for restoration. SWAN supports a programmatic EIS that all 5 of the sales can be tiered to since the impacts to vegetation and wildlife will be so significant. We are especially concerned about cumulative impacts to wolves.
32	40	Section 3.1.4	There are five of these huge projects going on at once in WI NFs an how can they all be separated into separate EISs when clearly they should be looked at for cumulative impacts.
33	22	The BE has been completed and is available in the project file. See Appendices F-I	SWAN is concerned about the viability of non-game species of wildlife on the Forest. WE request that any BE be prepared with site-specific data and information, not just with generic modeling or consideration of broad habitat types, and that the BE be fully completed BEFORE publication of the draft EIS.
34	39	Comment Noted	Concerned that the 43,600 acres is too large an area to be effectively evaluated through a single EIS.
35	42	Comment Noted	Winding so many and diverse harvest prescriptions into one EIS makes it difficult if not impossible to adequately address ecological effects of these actions. We are concerned about the scope and variety of activities purportedly being addressed within one EIS.
36	23	We are not showing in our transp. planning that we need to use the road up to or beyond this road for the project, so the berm shouldn't be removed at all.	All mileage of existing forest roads should be reduced as the roads are nearly impassable, have deep water-filled ruts. Enclosed map shows a berm (on road-----) that must remain to prevent vehicles from tearing up the swamp. The ruts through the swamp are down to the top of the culvert. Further traffic through the swamp would smash the culvert which would stop the flow of water.
37	10	Section 2.3 and 3.7	Roads should be constructed to the lowest standard possible to accomplish the proposed activities. In Mas 1.1, 2.1 and 4.1 the road density must be reduced below the 4 mi./sq. mile
38	39	Section 2.3 and 3.7	Overall we do not support any new roads in the project area. We do generally support permanent road closures and removal.
39	18	Section 2.3 and 3.7	Concerned about road construction, reconstruction and opening. There are too many roads in the forest now. The FS should look at how they used to harvest timber instead of driving to every tree.
40	39	Section 2.3 and 3.7	The USFS had a huge overabundance of roads and a huge backlog of road maintenance locally, regionally and nationally. Although the project description suggests that overall the project will reduce open road density below the desired future condition in the Nicolet Plan, we see the DFC for this area as too high and as an important issue in the new planning process.
41	2	Section 2.3 and 3.7	I am not in favor of closing ANY road on the CNNF. Most of the Nicolet needs to be logged, as overgrown and blowdown timber is a real problem as well as needed income and tax revenues.
42	47	Section 2.3 and 3.7	The BCPL is experiencing numerous cases of resource damage from ORV abuse. We are concerned that road reconstruction to higher standards will exacerbate resource damage, and management costs by increasing the ease of motorized access. In addition, the BCPL is vulnerable to other abuses such as garbage dumping and construction of illegal structures because we have a small workforce, scattered tracts and no law enforcement staff. While gates and signs stop some people, roads draw a significant number of illegal ATV and dirt bike activities.
43	47	Section 2.3 and 3.7	The BCPL would like to be consulted if road closures or decommissions will impact our access. On the other hand, the BCPL would like to see the CNNF consider the lowering of the overall road density to mitigate the adverse impacts mentioned above.
44	18	Section 2.3 and 3.7	Concerned about ATVs getting additional access, rocks and berms don't keep them out. ATVs destroy the area and tear things up.
45	21	Section n 2.3 and 3.7	I do like the fire lane system that we have now for access to controlling fires, lodging operations and recreational use. Let us not forget the handicap and elderly that can not walk far if at all. What good is the forest and rivers if we can't access them and use them?
46	33	Section 2.3 and 3.7	Road closings are unnecessary and counter productive. I am very familiar with the road system in this area. Many roads in the inventory you show do not exist (ex. 632, 32, 33, 360,121, 315) others are already closed--many examples. Roads close naturally if
47	33	Section 2.3 and 3.7. These roads are proposed to be left open under Alternative 4	I am especially opposed to closing of roads 5, 14, 315, 12, 95, 96, 71, 3016, 2978, 155, 2978A, 89, 2457A, 321, 35 and 23. These roads are used by fisherpersons, hunters, berry pickers, sight seers, etc.
48	36	Section 2.3 and 3.7	
49	51	Section 3.8	Any significant decrease in ruffed grouse or woodcock populations would create quite an economic impact in this region

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50	53	Section 3.8	The FS needs to expand its consideration of the economic and social benefits to the local and regional areas from federal timber sales. As harvest volumes decrease around the country, these lost revenues to small communities become a significant problem for local government. A stable supply of timber from federal forests is critical to maintaining loggers and their support businesses. In many of the small local communities, logging is the dominant industry, and the major employer. Loss of that major small-town industry would be devastating to the communities and families.
51	38	Section 3.8	Our concerns go beyond the below cost timber sale issue to include the economic efficiency of the timber sale, whether or not the costs and benefits, beyond those to the federal government, meet the government mandate of net public benefit. In other words, are the greater values of stand forest economics disregarded for the short-term financial benefit of the sale of trees to the timber industry?
52	38	Section 3.8	We are concerned with the adverse economic effects of commercial logging on public lands and the damage and loss of ecosystem service values associated with standing or otherwise intact forest ecosystems. The Forest Service's failure to quantify such effects at the project level or form the logging program as a whole is contrary to many federal and USFS regulations. The opportunity costs of the logging program, which include the value of uses forgone on areas logged plus the benefits associated with alternative uses of timber sale funds should be evaluated on a project basis. We request an impartial analysis of all values, both market and non-market
53	1	Section 3.1	Project-wide over 1200 acre of aspen is greater than 50 years of age and over 300 acres of jack pine is over 60. When I compare the needs with the proposed actions of 548 acres of clearcut harvest to regenerate aspen, jack pine and mixed aspen/conifers there is quite a difference.
54	45	Section 3.1 and 3.2	There is too much emphasis on pulpwood production in this proposal. You state that your goal is to move the forest toward a more uneven age class, yet using commercial timber harvest and encouraging aspen production seems to run counter to that goal. In this proposal 48% of the area is devoted to aspen and pulpwood production. Presettlement the forest was about 3% aspen. In presettlement times the Nicolet National Forest area was 61% hemlock-hardwoods. Today it is less than 1%. This composition represents decades of unenlightened extractive management and this must change.
55	53	Section 3.1 and 3.8	The aspen cover type is over-mature and needs to be treated immediately before more of the timber is lost. A lot of the economic
56	45	Section 1.3, 3.1 and 3.8	It appears that the driving force of this proposal is designed to meet the District's share of the CNNF's timber harvest targets. This prejudices a proper environmental analysis.
57	21	Comment Noted	I am against wilderness areas with no harvesting and accessible only on foot. I believe the forest is like a farm - it has to be harvested and replanted to survive.
58	53	Section 3.8	The FS cannot operate a timber sale program without loggers. An even flow of timber off of the national forests can go a long way toward stabilizing many of these logging operations.
59	1	Fencing is being proposed in small amounts in this project, not proposed on a wide-scale basis	Fencing is expensive and difficult to maintain within forested areas. Please discuss previous work with exclosures (e.g. Forest Service personnel on Huff Creek or Don Waller's work) to address the feasibility of the fencing strategy in the DEIS
60	22	All stands have been reviewed on a site-specific basis. Section 3.1 discusses Optimality	Please provide site-specific data. Conclusionary statements about the inherent rightness of a method of cutting does not satisfy NFMA's requirement to analyze the optimality or appropriateness of clearcutting or even-aged management. Reliance on a programmatic document like the LRMP does not satisfy NFMA.
61	39	Comment Noted. Section 2.7	The National Sierra Club organization supports legislation to end commercial logging within our National Forests. We firmly believe that the forests provide a more important role in protecting critical ecosystems and watersheds. We also argue that the Forest Service should use timber harvest only to restore ecologically underrepresented ecosystems or actively manage ecosystems requiring disturbance.
62	28	Comment Noted. Timber harvest is an approved method for vegetative manipulation and habitat enhancement in the Forest Plan. See discussion under 1.1-13	The clearcutting of trees in NFs is unacceptable to a majority of US citizens. These forests belong to all US citizens and should not be exploited and destroyed for profit. If logging companies want lumber they should purchase land and start to plant trees. Other farmers have to purchase or rent land in order to plant and harvest cash crops why should logging companies get special treatment.

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63	39	Section 3.1.4, 2.3.3 and 3.1	While there are various management objectives for the project, much of the emphasis of the project is on the commercial timber production, largely through clearcutting. This type of management may or may not be acceptable under the current forest plan. However, we must question whether emphasizing this type of management, and what we consider an over-emphasis on aspen production would be acceptable under the new forest plan. In addition such an over-emphasis could be in violation of the federal law: Multiple use is not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output (USC Title 16-531 (a))
64	30	Comment Noted	I always have and continue to support a variety of timber harvest techniques on our NFs. These lands are National Forests, not National Parks. Healthy forests require maintenance through proper logging activities to insure a constant supply of timber products and pulpwood. These activities also provide proper habitat for many plants and animals thereby giving us diversity.
65	30	Comment Noted	Anti-logging, anti-clearcutting, anti-hunting and anti-access sentiments expressed by a loud minority are influencing good scientific timber/habitat management of Nicolet negatively. The FS needs to manage our natural resources using good scientific knowledge
66	36	Comment noted.	I am concerned that no logging activity is planned for the property west of mine. There are many trees which should be select harvested Many adult maple trees soon will begin to rot and become useless. Select harvesting will allow new growth and also benefit wildlife. Logging is a main contributor to the local economy and should be continued as a logical cutting basis.
67	39	Section 3.3 and Appendices F-I	Have you inventoried TES in the area? How will they be affected?
68	1	Section 3.3 and 3.6	Restoration of long-lived species in the river corridor is of interest. Increasing the representation of these species will be difficult, given their vulnerability to excessive browse pressure. The extent and configuration of aspen clearcuts, wildlife openings, and roads needs
69	1	Section 3.3 and 2.3.3	We are concerned that the maintenance of wildlife openings and even scattered areas of even-aged aspen management within the Project Area will foster continued high white-tailed deer populations. In this part of the state, high deer populations appear to be associated with significant levels of herbivory on working list last species that occur within the Project Area. Thus, even though these species may be protected from direct effects of timber management by buffer zones or winter logging, they may suffer in the long term from the effects of nearby aspen stands and wildlife openings.
70	22	Section 3.3 and 2.3.3	Please do not ignore the fact the WI DNR is working to decrease the population of deer. The fact that the Forest Service fails to amend the LRMP to reflect the fact that the DNR has a target population range of approximately 1 million deer is arbitrary and capricious; the fact the Forest Service continues to perpetuate a cutting program to encourage the growth of the deer population violates the LRMP. The deer population has increased since 1986; perpetuation aspen and clearcutting to adhere to a LRMP that fails
71	22	Section 3.3 and 2.3.3	Another problem with the sale is the continuation of 375 acres worth of "wildlife openings" which are maintained clearcuts on behalf of deer, ruffed grouse and other species dependent on early-successional habitat. What the FS fails to acknowledge is that the power line and gas line corridors, bogs, swamps, agricultural fields, storms, and the constant cycle of cutting on the forest provides a steady succession of so-called wildlife openings" without the need to dedicate taxpayer money. As all citizens of the northwoods know, deer overpopulation is a major problem affecting the economy (deer/car collisions) and the environment (deer browse). Overpopulation of white-tailed deer is one of the largest conservation issues in Wisconsin. More "wildlife openings" will promote an increase in the deer population. Aside from the magnet effect associated with artificial openings, the higher nitrogen content associated with open-grown
72	39	Section 3.3 and 2.3.3	For much of the last century forest management practices throughout northern WI have focused on using even-aged management in part to provide wildlife openings for edge tolerant species. Such management practices have led to a deer overpopulation that has reached near crisis proportions. The ecological imprint of browsing significantly threatens the regeneration of species like eastern hemlock and American yew. In addition, high numbers of deer-car accidents continue to cost the public millions of dollars and are associated with a number of accident-related deaths. This is but one example of many that show the deleterious effects of large expanses of the edge effect. The USFS must reconsider its extensive use of even-aged management in the CNMF. The USFS must
73	47	Section 2.3.3 and 3.3	Due to its emphasis on habitat development for deer and grouse and lots of interdigitation of early successional habitat, the continuation of the current plan exacerbates deer browsing. Browsing is one of the chief causes for the region-wide failure of cedar and other browse sensitive trees and herbaceous plants. The existing plan will maintain or increase early successional habitats, especially aspen, which provides ideal habitat for deer. Deer density estimates during the past decade point poignantly to the fact that despite record harvests, deer hunting alone is unable to control the herd.

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74	47	Section 2.3.3, 3.3 and 3.2	We believe the CNNF and BCPL must work together to modify the habitat base to effectively bring deer numbers into a more manageable range. Implementing a cutting regime designed to minimize edge habitat and early successional forest types can, in our opinion, bring the herd into balance with the environment in combination with appropriate harvest quotas and feeding regulations. In our view, it is valid to promote habitat manipulation to decrease deer numbers, such as discontinuing game openings in critical interior forest management blocks.
75	19	Section 2.3.3, 3.3 and 3.2	The DEIS for the NWH project should describe what can be done on the project level to reduce deer impacts, and the expense of proposed methods (e.g., fencing) vs. deer reduction strategies that could be implemented cooperatively with the WI DNR. Info from deer exclosures on the Forest should be shared with the WI DNR.
76	38	Section 3.2 and 3.3	The planned activities are likely to jeopardize the viability of species that find optimal habitat in interior forests, forests with well-developed structures, and forests naturally disturbed by physical and biological processes. For many of these species, the FS has no up-to-date population data describing population numbers, locations, and trends, nor monitoring data on which the agency can rely to determine that the actions proposed in the context of the project will maintain numbers and distribution of these species sufficient for insuring long term viability.
77	47	Section 3.2 and 3.3	The drumlins in the NWH project area support a very rich and diverse ground flora and provide excellent growing conditions for high value northern hardwood stands. Some of the BCPL's best stands are located near Alvin/along Allen Creek. The BCPL recognizes the unique ecological and economic value of these stands and would like to see the CNNF create an Alternative Management Area adjacent to these tracts to retain their unique characteristics. The area delineated on the enclosed map appears to meet the criteria used to id potential AMA's in the course of Forest Plan revision.
78	1	Section 3.3.3.2	Quartz Lake is particularly important because it is an extremely soft water lake which supports a highly specialized flora composed of sterile rosettes as other lakes of this type do. Special care should be taken to avoid adding organic material that might jeopardize this unique natural community.
79	19	Section 3.2 and 3.3	Each DEIS should fully evaluate land management activities in the context of the potential for habitat restoration, habitat fragmentation, loss of connectivity, and the cumulative loss of species viability. Although endangered species and species of concern are notable focal points for evaluation, the DEIS should also evaluate potential impacts to other significant species (e.g., game species, furbearers, pollinators). Indicate what measures will be taken to protect critical ecosystem components from potential adverse effects of proposed management activities and land use (e.g., recreation).
80	51	Section 2.3.3 and 3.1	Despite existing aspen habitats below forest DFC's in MA 1, this proposal only identifies a need of treating mature aspen stands to maintain aspen acreage in that area. The end result appears to be a significant drop of aspen habitat in the project area, a continuing theme for the Forest. The RGS request the District considers this cumulative effect in their analysis and look at an alternative that
81	51	Section 2.3.3, 3.1 and 3.3	An increase in management of early successional habitat is essential if we are to reduce the rate of decline in many species. The Scientific Roundtable report itself highlights the role northern WI landscape plays in the regional populations of Neotropical migrants, many of those listed in the Report are early successional species. The project area provides opportunities for the management of early successional landscapes that would benefit species that are declining nationally, including golden-winged warbler, chestnut-sided warbler, indigo bunting, American woodcock, and Eastern towhee.
82	27	Section 2.3.3, and 3.1	You have over 12,000 acres with a large aspen component, of which over 1600 acres is beyond minimum rotation and you only intend to clearcut 548 acres?? Why not clearcut 1600 acres?? You repeatedly mention wildlife habitat, lets create some. We need more and larger clearcuts
83	30	Section 2.3.3 and 3.1	Your letter states that 300 acres of jack pine and 1670 acres of aspen in this area are beyond minimum rotational age guidelines. Therefore, your proposal to clearcut for regeneration only 548 acres seems insufficient if additional acres are still available.
84	31	Section 2.3.3 and 3.3	WE need grouse and deer habitat
85	51	Section 2.3.3 and 3.3	The RGS remains concerned about the decline in aspen forest communities nationwide, regionally and on the Forest. During the past 18 years, aspen forests in WI have declined by 265,000 acres. Since the mid-1960's the total area of aspen in MI, WI and WI, which contains 80 percent of the aspen in the Eastern US, has decreased by 21 percent (Leatherberry and Spencer, 1996). In WI, private individuals own 57% of the aspen, a majority of these landowners have not harvested timber and thus have declining opportunities to perpetuate aspen habitats. The WI NFs provide one of the last opportunities to maintain early successional landscapes.

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86	51	Section 2.3.3 and 3.3	Not surprisingly, many wildlife species dependent upon young forest habitats are experiencing population declines as a direct result of the ongoing maturation of eastern deciduous forests. Smith et al. (1993) found that 76% of the Neotropical migratory birds that are experiencing significant population declines in the eastern US require grassland or young forest/shrub habitats. Probst and Thompson (1996) reported that of 187 species of Neotropical migratory songbirds that breed in the Midwest, 95 use shrub-sapling or young-forest habitats to some degree during the breeding season.
87	51	Section 2.3.3 and 3.3	Partners in Flight has ranked the golden-winged warbler the # 1 species of management concern in the Midwest. This bird is at highest density in pure stands of regenerating aspen from 1-4 years of age. The CNNF is obviously the center of this bird's range and undoubtedly is a population source for this species and should remain as such.
88	1	Section 3.3	A great deal of effort will be expended to create and maintain artificial permanent upland openings. The DEIS should weigh the benefits of this proposal and its impact on wildlife openings. If openings are to be accomplished, please explain how they will be accomplished.
89	2	Section 3.3	I am in favor of maintaining and expanding game openings. These are very important, and have not been very well maintained in the past few years.
90	42	Section 3.2 and 3.3	The value of artificially perpetuated wildlife openings is unproved and suspect. In a natural landscape, and even in a managed one, openings for early successional species occur in response to windthrow and fire. They are typically much messier and more brushy and filled with dead and downed material than artificially created openings. Artificial openings are far too clean to provide optimal habitat for shrub-land species. Their small size may make them function as a sink. Early successional habitat on the landscape as a whole is not in short supply. Camps, woods roads edges, and recreational areas all contribute. Artificial openings are as nest boxes are to natural cavities, usually inferior. In general we are opposed to the creation of such openings. If they are to be included in the proposal, we would need to see survey data documenting their use, with associated lists of vertebrate species. The amount of acreage and their placement should be carefully considered.
91	30	Section 3.3	Wildlife openings along with gated/bermed/seeded trails (which need mowing) provide habitat and great amounts of food supplies for both game and non-game species. Recently, many such areas of the Nicolet have been neglected for various reasons, and it is time to provide much needed maintenance of these areas.
92	53	Comment noted	National Forests are suffering from outbreaks of disease, increasing forest mortality and generally declining forest health. Fuel loads are increasing, resulting in dangerous conditions that can cause harm to both people and property near the NFS. 65 of 192 million acres in the NFS are at high risk of catastrophic wildfire, insect infestation, and disease. Any analysis conducted by the FS should recognize that responsibility by discussing in detail the present condition of this study area. More active mgmt. of the including increasing timber harvesting can reduce these problems and return the forests to healthier conditions.
93	39	Section 3.8	While there is some truth to the notion that forest products are renewable, the worldwide demand for timber and paper products is growing so rapidly that the demand is no longer sustainable and is adversely affecting forest ecosystems worldwide. Creating an increased demand through government subsidized timber sales is both generally irresponsible and may well be in violation of a number of international trade agreements.
94	86	Section 3.8	FS loses money on logging, local economy suffers because of damage to recreational resources, and the environment suffers. Should withdraw project until less damaging timber harvests can be done which are actually profitable.
95		Section 2.3.2, 3.8 and 3.6	Value of wildlife habitat, fisheries and watershed protection, soil loss protection, and value to species like the bald eagle, timber wolf and cerulean warbler will be greatly diminished by the logging projects (5 major EISs). There will also be a loss of value for solitude and primitive recreational experiences.
96	79	Comment Noted	Working the Chequamegon-Nicolet National Forest will produce revenue and goods for all involved. Let's get going with these logging and road building projects.
97	77	Withdrawing lands from production is a Forest Plan level decision and cannot be done in this analysis.. Compatibility with Forest Plan Revision is discussed under Section 3.1.4	All logging projects are taxpayer subsidized and ecologically destructive, and I am urging you to put an end to giving this aide to the timber industry. Instead of supporting the continuance of logging by constructing roads in the forest, I urge you, as a Forest Service official, to permanently withdraw all forest lands from commercial development, and to wait for a new Forest Plan before moving ahead
98	75	Section 3.8	Please say no to corporate profits at the cost of diminishing a national treasure. As if losing our forests isn't enough, we, the taxpayers are required to subsidize the removal of our precious resources by paying \$97-120/acre to assist that purpose.
99	30	comment Noted	Using timber sales to accomplish vegetation management goals is logical and appropriate. Today's Foresters are well-trained in establishing and conducting timber sales in an ecologically-sound fashion
100	1	See Map 3	Please depict management areas on map

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101	1	No management is proposed in any LAD sites. See sections 3.2 and 3.4	Explain specifically how on LAD sites, ecological classification, patch size, forest age, older successional stages and LTA related data are used to develop alternatives
102	1	Section 3.1	The proposed action to increase representation of long-loved species through regeneration efforts is supported by information provided by last Statewide Forest Assessment (published Nov 2000). While growing stock volumes have actually increased since the last assessment (1983) that volume is concentrated in the older age classes of these species. Use of FIA data coupled with LTA information is providing the forestry community some direction on where we should be focusing our broadscale efforts. Discussion of this data along with that on management techniques, regeneration challenges and the merits of these species would be warranted in the DEIS.
103	1	comment noted	The point made regarding growth rates of trees limiting their quality and size and therefore their economic value may not present an accurate picture. Perhaps it would be more accurate to say the suppressed growth rates are retarding development into more valuable veneer size classes; leading to decreased economic return.
104	1	comment noted	Reference any research which has been done to evaluate the technique of creating canopy gaps to promote mid-tolerant species among hardwood, and its impacts on forest regeneration, ground flora, fauna and subcanopy species.
105	22	The decision criteria is included in the Roads Analysis Process which is located in the project file.	Include decision criteria of road closures. Impacts of road closures in relationship to access to private lands, forest fire suppression as well as recreational pursuits should be considered in the DEIS.
106	1	Section 3.3	It is important that the DEIS address, by management area, the impact of increasing permanent road densities on endangered resources. If D level road reconstruction activity raises roads to a higher standard, these should be closed to traffic after login is completed.
107	1	No management is proposed in any LAD sites. See sections 3.2 and 3.4	Address the potential impacts of the proposed project on SNAs RNAs and Special Areas, especial actions adjacent to SNAs and RNAs
108	1	Section 3.2	Address known invasive species including garlic mustard, honeysuckles, buckthorn and gypsy moth.
109	3	Comment Noted	Contact Jim Meeker at Northland college who has been studying fencing and effectiveness for years.
110	3	Comment Noted	Contact the DNR fisheries biologist (Steve W) for specific info. On how fish cribs affect and skew species size class distribution and how native compared to stocked fish select habitat.
111	3	Section 3.6	Would like a visual buffer along roads.
112	7	Comment Noted	In stands 149001 and 148004 there is timber that has been blown down by storms that may still be of some value. More of the timber will go to waste due to storms if it is not harvested in the near future.
113	9	All roads currently closed would be closed after timber harvest is completed. Section 3.7	Adjacent landowner is concerned that road construction of rd 8 will allow people access to his property. He would like the road bermed at completion of the project.
114	11	Comment noted. Section 3.7	My concern is that the logging roads will allow people to drive right up to the back side of my property and then onto my property. I am having this problem now from past logging jobs. My concerns are about harvest units 137006, 139011 and 139012. These units border my property and my concern is how far they will they come to my property and the timing of these harvests. If possible I would appreciate the new roads coming up to my property could be completely closed off to prevent trespassing--specifically road 219 and 13.
115	22	A roads analysis process was completed and is located in the project file. Section 3.7	Please provide assurances that this project is in compliance with the new Road Policy implemented in January of this year.
116	22	See Sections 3.1 and 3.5 cumulative effects analyses	Please consider the cumulative impact of this sale with ongoing private, state, industrial and other federal sales (for example, Rosen Dam Salvage sale located near Alvin) within the impacted area.
117	22		Please provide information as to how these actions will impact the following identified LAD Areas: Alvin Creek Headwaters; McDonald Creek Bog and Hardwood Forest; Pine River Corridor; Brule Creek Red Pines; and Wapoose Lakes and Wetlands. SWAN opposes any actions proposed that will jeopardize the integrity of these areas.
118	22	Section 3.1.3.3	Please provide past monitoring data from past projects and success rates to support that the 96 acres of underplanting of white pine, oak, hemlock, cedar and other species will not be browsed to the ground by deer.
119	22	Section 3.3	Please be sure to reference Progress Report of Wolf Population Monitoring in WI for the period of April-Sept. 2000 by Adrian Wydeven, et. Al.

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120	38	Each resource addresses cumulative effects under Chapter 3	It is essential that the analysis include an in-depth treatment of cumulative effects especially in regards to soils, water quality, fragmentation, old growth, TES, MIS and Neotropical migrant birds. All activities including past, present and reasonably foreseeable future activities on each and every land ownership must be incorporated.
121	37	Section 3.6	Visual impacts of the project need to be discussed
122	39	Section 3.5	How will the management prescription affect rivers, streams and wetlands. Will buffer zones be considered? Mitigation?
123	39	Appendix C	For selective cuts and thinning you should indicate a percentage or range for the harvest in each stand.
124	39	Section 3.1	Would like to see clear scientific evidence that shows thinning achieves larger diameter hardwoods in a healthier way over the long term compared to natural processes. Does this science consider impacts such as soil disturbance and removal of potential soil nutrients.
125	39	Section 3.3	Please identify the species specific to the area that use large diameter trees for denning and nesting sites and their abundance and whether science shows they can favorably inhabit areas with an abundance of mid-to-large diameter trees.
126	39	Section 3.7, 2.3.3	Current science also identifies total road density as an important issue for suitable habitat for a variety of species and thus road density should be addressed along with open road density. WE also feel that roads should not be removed from the inventory until after they have been regenerated to natural conditions.
127	39	Section 3.8	WE would like accounting methods used to clearly show the taxpayer whether or not the sales end up providing subsidized profits to the contractors and their companies.
128	42	comment noted	Wildlife is too general a term, need to be more specific (game species only?)
129	42	Section 3.7, 1.3.2	WE are concerned about the amount and placement of reconstructed roads on the project. What are the current conditions of these roads? If they are woods two tracks, not currently passable by car or truck and marginally passable by ATV, as is true of so many roads in this area, then we find the terminology "reconstruction" to be disingenuous. A substantial upgrade of these roads ecologically qualifies as construction and should be labeled as such.
130	42	Section 3.7 and 3.3	What means are proposed to minimize the ecological impacts of road construction? Are there sensitive species in any of these proposed "reconstructed" road areas?
131	42	Comment noted	Commenter brought up several concerns regarding the Spread Eagle Barrens which are not in or near the project area.
132	42	No management is proposed in any LAD sites or RNAs. See sections 3.2 and 3.4	
133	42	These areas are outside the project area, no harvest is proposed.	
134	47	Comment Noted. See 2.4.3	Many of the CNNFs and BCPLs best hemlock-hardwood stands and other unique resources such as old-growth cedar swamps are located in the project area. The BCPL would like to forge a common vision to protect and enhance these resources.
135	47	Comment Noted	Suggest leaving a permanent overstory of long-lived species like pines, white spruce or oaks in shelterwood and removal cuts so that edge effects are minimized and structural diversity is maintained. Edge effect impacts are minimized as the residual overstory increases, especially at basal areas greater than 30.
136	47	Section 2.6.	Consider leaving a rim o unmarked trees to maintain a substantial number of den and reserve trees around ephemeral ponds or intermittent streams to prevent premature drying, rutting and to provide downed woody debris into the waterbody. These areas provide critical habitat for amphibians, woodland raptors, some interior forest songbirds, black bears and aquatic invertebrates.
137	47	Section 3.3 and Appendix C	Re-enter stands when the basal area exceeds 120 or better to maintain interior forest habitat conditions.
138	51	Alternative 4 proposes converting hardwoods to aspen. See section 3.1.3.5	Opportunities to increase the size of patches of aspen habitat through conversion of adjacent mixed hardwoods to aspen. Several aspen patches in the western and northern sections of the project area are isolated from each other. There appear to be opportunities to connect these units or reduce the fragmentation of early successional habitats by interstitial areas of a different ecosystem type. Compartments 81,83,86,87,142 and 145 all appear to provide opportunities to increase the patch size of early succ. communities.
139	51	Section 2.3.2	Recreational benefits of early successional wildlife species for consumptive and non-consumptive purposes needs to be considered during the project evaluation.
140	53	Section 3.8 and 1.3.5	Harvest levels should be equal to the allowable cut in the forest plan which would provide for a long-term continued harvest at sustainable levels.
141	53	comment noted	The vegetative condition is over-mature with substantial fuel loading. Vegetative management is essential for this area and must be conducted quickly.

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142	53	Comment noted, see section 3.6	The activities proposed in the river corridor are appropriate. The need for longer-lived species and maintaining a forested riparian area means that management of the corridor is essential. Active management of the riparian area is appropriate to meet the desired condition described for the river corridor.
143	19	Section 1.5. Only minimal rx burning is proposed (48 acres). Impacts would be very minor and would be in compliance with the Clean Air Act.	EPA recommends that surveys of forest users be conducted, although this type of action may be more appropriate for forest-level than project level planning.
144	19	Section 3.5 and 3.3	The DEIS should identify impacts to water, floodplain, and wetlands, including identification of Section 404 Clean Water Act requirements and proposals to ensure compliance with these requirements. Potential for adverse impacts, such as increased siltation and turbidity, changes in the direction of stream flow, substrate, dissolved oxygen, temp. and habitat deterioration. Critical fisheries habitat, especially spawning and rearing areas and other sensitive aquatic sites. Identify process used to evaluate cumulative watershed effects
145	19	Section 2.6 and Appendix E	Under CWA Section 404(f)(1)(A), normal silvicultural practices (seeding, minor drainage, and harvesting for forest products) are not prohibited or otherwise subject to regulation. Also construction and maint. Of forest roads is exempted but only in cases in which BMPS are used.
146	19	Section 3.5 a discussion of monitoring programs for water quality is included in the Water Resources Specialist Report which is included in the Project File.	Need to discuss specific monitoring programs that will be implemented to determine potential impacts on surface and ground water quality and beneficial uses. Should also evaluate whether maintenance and protection of water quality can be GUARANTEED
147	19	Section 3.3	Need to indicate what measures will be taken to protect critical fish and wildlife habitat and the feasibility of proposed mitigation measures should be fully demonstrated.
148	19	Comment Noted	
149	18	Comment Noted	Make sure the gauge fencing for the enclosures will also keep out rabbits.
150	24	Comment Noted	Consider planting pin oak, beechnut and hickory and clover to produces a food crop in different areas
151	24	Fishing seasons are not under the jurisdiction of the Forest Service.	Close the spring season in Alvin/Stevens Lake on bluegills until June 25th to protect the spawning
152	24	This is outside the purpose and need for the project.	Build a water/depth control dam for Stevens Lake with a gated overflow
153	25	comment noted	Encourage more jack pine than just the rx burn areas
154	25	Section 2.6	recommend planting white pine along stream corridors for a longer lived species that will also provide woody debris and be more wind firm.
155	34	Assistant Ranger for Timber has contacted this individual to discuss this option	Adjacent landowner wants to know if he could use a road proposed for reconstruction to remove a timber harvest on his land.
156	35	Comment noted	Not enough planting of long-lived species is proposed.
157	22	Appendix E	Please provide site-specific mitigation measures. Reliance on the LRMP or non-NEPA BMPs do not satisfy NEPA.
158	19		Each DEIS should include a description of current and proposed land management activities including prescribed burning and road construction and their impact on air quality. Federal agencies are required to assure that actions conform to an approved air quality implementation plan under the Clean Air Act [Section 1769c)].
159	53	comment noted	NEPA requires only an assessment of proposed actions not the cumulative impact or possible environmental impacts of less eminent actions. Accordingly, the cumulative impacts of projects not yet proposed need not be considered in Forest Service analysis.
160	32	see section 3.9 heritage surveys were completed	Heritage surveys need to be completed

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161	43,41,33,23,5,9,11	All concerns were taken into consideration during the Roads Analysis Process for this project. The RAP is documented in the Project File. In addition, the Road Engineer for NWH Project contacted individuals to discuss concerns	Individual commenters has concerns about specific roads, primarily relating to maintaining landowner access to private property but limiting additional access into private property.
162	28,40,39,45,57,58,60,61,62,63,64,65,66,67,68,69,70,71,74,75,76,77,78,80,82,85,86	comment noted, see Chapter 1 which discusses purpose and need for this project	Many individuals are opposed to timber harvesting on National Forest lands and want the NWH Project to be cancelled
163	72,73	See section 3.3.3.2	Commenter brought up concerns about eutrophication potential from tree drops in lakes
164	1	See section 3.3.3.2	Quartz Lake is particularly important because it is an extremely soft water lake which supports a highly specialized flora composed of sterile rosettes