

APPENDIX B - NON-RELEVANT ISSUES

This appendix summarizes information about miscellaneous issues and concerns that were considered to be very minor or non-relevant in the Hoffman-Sailor West project area (see Chapter 2, section 2.4). Additional information and records for each topic are contained in the analysis record.

B1 Forest Plan Expiration

The Chequamegon-Nicolet National Forest is in the process of revising and combining the existing Land and Resource Management Plans (Forest Plans) for the Chequamegon and the Nicolet National Forest, which were administratively separate at the time the 1986 Forest Plans were developed. A Notice of Intent to revise and combine the Forest Plans was issued in 1996. As part of this process, various inventories and evaluations are occurring. Additionally, the Forest is in the process of developing alternative land management scenarios that could change the desired condition and management direction for the Forest. A Draft Environmental Impact Statement (DEIS) for the proposed Forest Plan was published in 2003. It discloses the potential effects of the different land management direction scenarios considered in detail.

As a result of the Forest Plan revision effort, the Forest has new and additional information beyond that used to develop the existing Forest Plans. This information has been used where appropriate in the analysis of this project to disclose the effects of the proposed activities and any alternatives developed in detail.

The decisions associated with the analysis of this project will be consistent with the 1986 Chequamegon Forest Plan, as amended.

Under regulations of the National Environmental Policy Act (40 CFR 1506.1), the Forest Service may take actions while work on a Forest Plan revision is in progress because a programmatic Environmental Impact Statement – the existing Forest Plan Final EIS, already covers the actions.

B2 Loss of Potential Forest Plan Revision Options

There is some public concern that the actions currently being taken will preclude selection of specific Forest Plan revision alternatives. Although this analysis is based on existing Forest Plan direction, it also incorporates new information obtained since 1986.

New information considered in development of this proposal, alternatives, and effects included: new Federally listed species (Appendix A); new Regional Forester Sensitive Species (Appendix A); Landscape Analysis and Design Areas (LAD)(Chapter 3, section 3.1.2.); potential roadless inventory areas (Chapter 1, section 1.2.3); Forest Plan revision vegetation objectives (Chapter 4, section 4.2.4); and Forest Plan revision road density objectives (project record documents).

The scope and scale of vegetation treatments and road access management for this project area is within all of the goals, objectives, standards, and guidelines found in the range of all alternatives considered for the revision (proposed Forest Plan). There are some vegetation treatments that result in small trade-offs, but have no impact on limiting the range of options for decision-making and alternative choices for the Forest Plan revision (Chapter 4, section 4.2.4).

B3 Environmental Justice

Executive Order 12898 of February 11, 1994, Environmental Justice as part of National Environmental Policy Act (NEPA), calls for consideration of the environmental, health, and economic effects on minority and low-income areas. Environmental justice means that, to the greatest extent practicable and permitted by law, populations are provided the opportunity to comment before decisions are rendered on, are allowed to share in the benefits of, are not excluded from and are not affected in a disproportionately high and adverse manner by, government programs and activities affecting human health or the environment.

In addition to direct contacts to Native American Indian tribes and landowners in the vicinity, notice of this analysis was posted in the Park Falls Herald, a local, weekly newspaper. Additional public participation information is included in the project record. Populations in the project area have been notified of their opportunity to comment on this analysis using a variety of media.

The implementation of the proposal would have very little potential to impact directly, indirectly, or cumulatively any minority or low income populations. Table B-1 contains 2000 United States Census Bureau statistics on the estimated percentage of people in poverty in Wisconsin and the three counties surrounding the project area. Table B-2 contains 2000 United States Census Bureau statistics on the estimated percentage of minorities in Wisconsin and the three counties surrounding the project area.

Table B-1: U.S. Census Bureau-Estimated Poverty Percentages	
State/County	People of All Ages In Poverty
	Estimated Percentage
Wisconsin	9.2
Price	10.4
Oneida	8.9
Vilas	11.7

Table B-2: U.S. Census Bureau-Estimated Minority Percentages	
State/County	Minorities
	Estimated Percentage
Wisconsin	11.1
Price	1.8
Oneida	2.3
Vilas	10.3

All the proposed activities occur within the project area in Price County. Oneida and Vilas Counties do not border the project area, but have populations who may use the project area. Price County has less than the state average of a minority population. Price County has a higher than state average for people in poverty. Most of the direct, indirect and cumulative environmental effects of the proposal occur specifically within the project area on National Forest System land (see Chapter 4). Therefore, no disproportional environmental, health, or economic impacts are anticipated to occur to minority or low income populations as a result of implementing any of the alternatives.

B4 Forest Health and Wildfire Risk

Some people are concerned that the project area is in declining health, and as a result, more susceptible to fire, insect, and disease. They wish timber management activities to increase due to these "increased" risks. Forest health and productivity was considered in the analysis. All action alternatives propose

harvesting of mature forest that could be more susceptible to insect and disease infestations (Chapter 1, section 1.4.1). Risk of wildfire is not considered to be particularly high in the project area and has been dismissed from further consideration in this analysis.

There no need for fuels management activity in the project area because fuel loads do not generally accumulate very easily due to climate factors (32 to 34 inches of annual precipitation). One exception to this is significant wind events that create substantial areas of wind throw. When there are hundreds of acres flattened by wind, in combination with drought, significant fuel loadings can occur and lightning can cause wild fire (example: Folds Creek fire in 1986 burned in wind thrown aspen, hardwoods, and hemlock as well as red pine plantation and cedar swamp). This condition does not exist in the project area. Wildfire statistics for the District show the frequency of wildfire is low, the fires are small (less than 5 acres), and low intensity (project record document Response to Public Comments - 2002).

B5 Restoration of Forest Types

Some comments included a request to “restore” more aspen in the project area and some included a request to “restore” large blocks of interior, hardwood forest habitat. Another concern raised was the potential loss of oak-hickory components as a result of the proposed action.

A Forest wide assessment (Landscape Analysis and Design on the Chequamegon-Nicolet National Forest - April 1999 - Draft) considers the recovery potential for northern hardwood/hemlock, interior forest in the project area (LTA Xa03, formerly Jc04) as poor. Only those areas with high, medium, and low recovery potential were ranked. Poor potential areas did not fall into any of these three rankings. Based on the past history of the area and the limited potential for the area to be restored to the type of hardwood communities that were once present, management of the existing pioneer vegetation types (such as aspen) is still an appropriate objective for the Hoffman-Sailor West project area.

The alternatives provide a range of the aspen type maintenance and restoration. While current Forest Plan management direction calls for aspen to be 35-65% in MP1, the project area is comprised of 42% wetland types that would not support fully stocked aspen types. With only 58% of the entire project area available for upland forest management opportunities, it would not be possible to reach the upper range of Forest Plan objectives for aspen in this project area.

The alternatives will have no impact on oak-hickory communities. Oak-hickory communities do not exist and historically have not existed in Price County.

B6 Indiana Bat

One of the comments received concerned what the project would do to the federally endangered Indiana bat. There are no expected effects on Indiana bat. Per the US Fish and Wildlife Service, there is no habitat or known species population within the project area. The range of this species as currently documented only extends into the extreme southern portion of Wisconsin.

B7 Noxious Weeds

There was a concern raised that timber harvest operations could result in the spread of noxious weeds. The State of Wisconsin has three listed “noxious” weeds: Canada thistle, leafy spurge, and field bindweed. The USDA-Animal and Plant Health Inspection Service (APHIS) lists five “noxious” weeds: Canada thistle, leafy spurge, field bindweed, purple loosestrife, and multiflora rose. APHIS considers purple loosestrife and multiflora rose as noxious while the State of Wisconsin lists them as “nuisance” weeds. There are no known infestations of noxious weeds within the project area. If (through additional routine surveys or observations) noxious weed infestations were found in areas of forest management

activity, this would be considered new information and management options to reduce risk of spread would be considered at the time of discovery.

B8 Non-Native Plants and Invasive Plants (NNIS)

There are two known invasive plant species populations within the Hoffman-Sailor West project area. The probability for logging activities to introduce or spread invasive plants from these locations was considered small in the affected area. Both locations are being treated to eliminate the presence of these plants (Chapter 2, section 2.3.3). Where earth disturbing activities could occur, mitigation measures that require quick re-establishment of native species in order to minimize the potential for non-native, invasive species to occupy disturbed sites have been incorporated into the analysis (Chapter 2, section 2.3.3). Additional measures to contain existing invasive species or to prevent their spread were not considered because of the relatively small, identified risk (project record documents for NNIS). Even so, the District is monitoring the potential for invasive plants to be introduced and spread by logging activities. See the Park Falls Blowdown Decision Notice and Finding of No Significant Impact (June 2002), page 2 and Attachment 2.

B9 Herbaceous Understories

There are concerns about the effects of logging practices on understory herbaceous plants and woody shrubs. Some respondents have suggested the use of only winter logging to prevent compaction and other potential disturbances to understory vegetation. There is little evidence to suggest that logging practices reduce or eliminate the occurrence of understory plants across the landscape. Some treatments do change understory composition in the area treated because of the change in microclimate conditions. The impact appears to be relatively short term. Disturbance to the understory from timber harvest equipment can be reduced by the mitigation required with the alternatives being considered. This mitigation requires that harvest operations be restricted to dry or frozen ground conditions to reduce rutting and compaction, which also limits the potential for ground plants to be disturbed (Chapter 2, section 2.3.5). Restriction to winter or frozen operations would only add a slight increase in protection of the existing understory plants since some ground disturbance still occurs with winter logging operations.

There are studies that indicate that timber harvest activities do have some long-term impacts to understory composition. Some of these studies have been criticized because they lack data on pre-treatment conditions. The Great Lakes Indian Fish and Wildlife Commission, in cooperation with the USDA Forest Service, is conducting a long-term study that will document pre and post harvest understory composition. The intent of the study is to continue to track changes (if any) in understory composition following a harvest.

B10 Soil Nutrient Depletion

Timber harvest methods can have an effect on the nutrient status of soils. Soils that have very thin A and B horizons and/or very thin organic layers will have a lower nutrient reserve capacity than soils with thicker A and B horizons and/or with a well developed organic layer. Some of the soils in the project area are comprised of medium to coarse sands which have thinner A and B horizons and/or thinner organic layers than other soils in the project area. These medium to coarse sands are at the highest risk for nutrient depletion from timber harvest activities.

Some of the proposed timber harvest treatments are red pine plantation thinnings on sandy soils with lower nutrient status. Because these timber harvest treatments only remove some of the trees, there are a number left on site which provides organic matter and nutrient cycling. Over the entire rotation of a stand, precipitation and normal weathering does replace nitrogen, potassium, and phosphorus lost by tree

removal and deep leeching. It is unlikely that the amount of organic matter and nutrients removed in the thinned trees will have a negative effect on the nutrient status of these soil types. There will still be a majority of the above ground biomass (trees, shrubs, ground flora) and forest floor organic matter left in place following harvest.

B11 Groundwater Contamination

In scoping, there were issues raised about possible contamination of groundwater via caves and springs. There are no caves within the project area or in the general geographic area. Caves are generally associated with Karst topography that develops from limestone geologic formations. There are no limestone formations in northern Wisconsin. Surface contamination of springs through sediment or other contaminants from any of the proposed activities is mitigated by implementation of Wisconsin's State Best Management Practices. See water quality issues in Chapter 2 (sections 2.3.6 and 2.3.7). Within the project area, sediments or contaminants getting into and being transported by groundwater is unlikely because the glacial deposits that make up the water table filter out potential sediments and contaminants.

B12 Compliance with the Migratory Bird Treaty Act (MBTA)

There was a comment that indicated that the Forest Service could be in violation of the MBTA. This issue has been dismissed. Per Leslie Auriemmo, USDA Office of General Counsel, in a document titled "The Migratory Bird Treaty Act", the intent of the MBTA was not to regulate the taking of migratory birds through timber harvesting. Courts have ruled that habitat modification does not amount to a taking under the MBTA.

B13 Prescribed Burning (air quality/erosion)

Some of the alternatives include one 16 acre wildlife opening that is proposed to be maintained with prescribed fire. General concerns about prescribed burning include smoke, air quality, safety, visibility on roads near the fire, impacts to resources, and fire escape. Smoke and fire escape are addressed in the analysis for this project (Chapter 2, section 2.3.8). Other general concerns are not considered relevant for this particular prescribed burn.

More specifically, the prescribed burn unit is small enough that only a short term reduction in air quality in the immediate vicinity of the project, from the smoke produced, is expected to occur. Prescribed fire does produce particulate matter and other gases that make up smoke. The amount of smoke produced from the proposed project would be a minor amount in terms of its effect on air quality. Because burning is a short duration event, the effect of smoke produced would be temporary and would dilute quickly. Based on past experience burning these types of fuel models and the predicted amount of smoke produced, there would only be very limited, short duration effects. The burn unit is adjacent to a road that is not open to public traffic, so smoke on open, public roads is not expected to be a safety hazard. Impacts to soil and water quality through erosion and sedimentation and organic matter removal are not a concern because our experience with fires in this area shows that they do not burn hot enough to negatively impact soil organic matter or expose soil to erosion.

B14 Windthrow Potential of Mature Trees

There is a general concern that the silvicultural treatments (timber harvest activity) could have the potential to make the project area more susceptible to windthrow of the remaining trees.

Soil types that have a silt loam surface texture over glacial till and soil types that are somewhat poorly drained to poorly drained are generally more susceptible to windthrow of mature trees. This is because tree root systems tend to be shallow because of perched or seasonally high water tables. There are

several proposed treatments that are on soils where windthrow is a common natural event. No specific mitigation measures are proposed for stand treatments because trees fall as a result of many different causes and toppling of trees by wind is a continual process in forests. Windthrow is a random event where individual or small groups of trees fall or occasionally more extensive areas of trees blow over due to wind. Cradle Knowl topography and windthrow are part of the natural process on these types of sites and personal observations (Greg Knight, Soil Scientist) do not indicate a significant increase in windthrow due to silvicultural treatments.

Silvicultural treatments can increase windthrow potential in conifer plantations where stand thinnings have not occurred in a timely manner and tree root systems are poorly developed due to overcrowding. Jack pine is particularly susceptible to this crowding effect and subsequent potential for windthrow following thinning harvests. There are no proposed Jack pine thinnings in the project area at this time. In most other thinning treatments windthrow hazard is not substantially increased because not enough trees are removed to affect the exposure of trees to wind.

B15 Beaver Ponds for Waterfowl Habitat

One of the comments suggested that beaver ponds might fulfill many of the same objectives as the proposed construction and maintenance of manmade impoundments. There is no proposal to construct additional manmade impoundments. The alternatives do propose maintenance of existing manmade impoundments. Artificial impoundments, while containing similar habitat as that found in a beaver pond, provide stability not always found with beaver ponds. Beaver ponds can be quite transient in nature. Trapping occurs and dams are removed for various reasons (fisheries improvement and floods or other natural occurrences). Additionally, artificial impoundments can control water levels, thereby maintaining the best habitat for waterfowl production, which is the main purpose of the Upper Squaw Creek Wildlife Impoundment. Beaver ponds do not allow for the management and maintenance of the optimum emergent vegetation:open water ratio for waterfowl production.

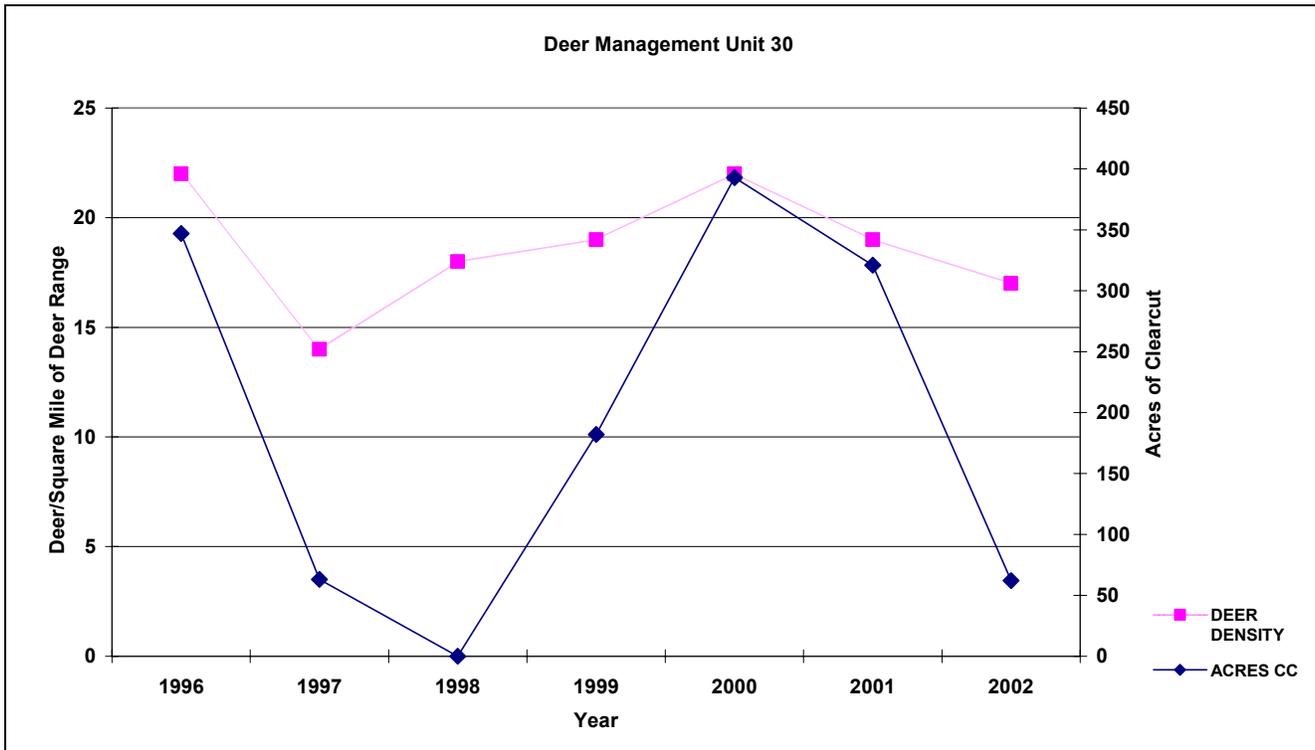
B16 Aspen Management and Forest Tent Caterpillars

From comments on the DEIS for this project, there was some concern that managing the forest for early successional species in the project area would cause increases in some species and result in impacts to overall forest health. One of the species of concern was forest tent caterpillars. Forest tent caterpillars feed on a wide range of forest trees covering the range of major forest types on the Chequamegon-Nicolet. It prefers not only aspen and birch, but also the northern hardwood species of basswood, oak and sugar maple. Forest tent caterpillars are native to our forests and follow somewhat predictable population cycles. Although outbreaks may be somewhat spectacular (as in Price County in 2001) they are not considered an indicator of poor forest health. Natural enemies of the caterpillar and weather cycles are effective at bringing outbreaks under control. For more information on the forest tent caterpillar, see the USDA Information Sheet NA-PR-02-01 (Katovich and Hanson 2002). Currently the caterpillar is in a downward trend, and the past winter has significantly reduced populations on the Forest. As such, it is not a relevant or major issue on the forest or within the Hoffman-Sailor West project area.

B17 Deer Herbivory and Overpopulation

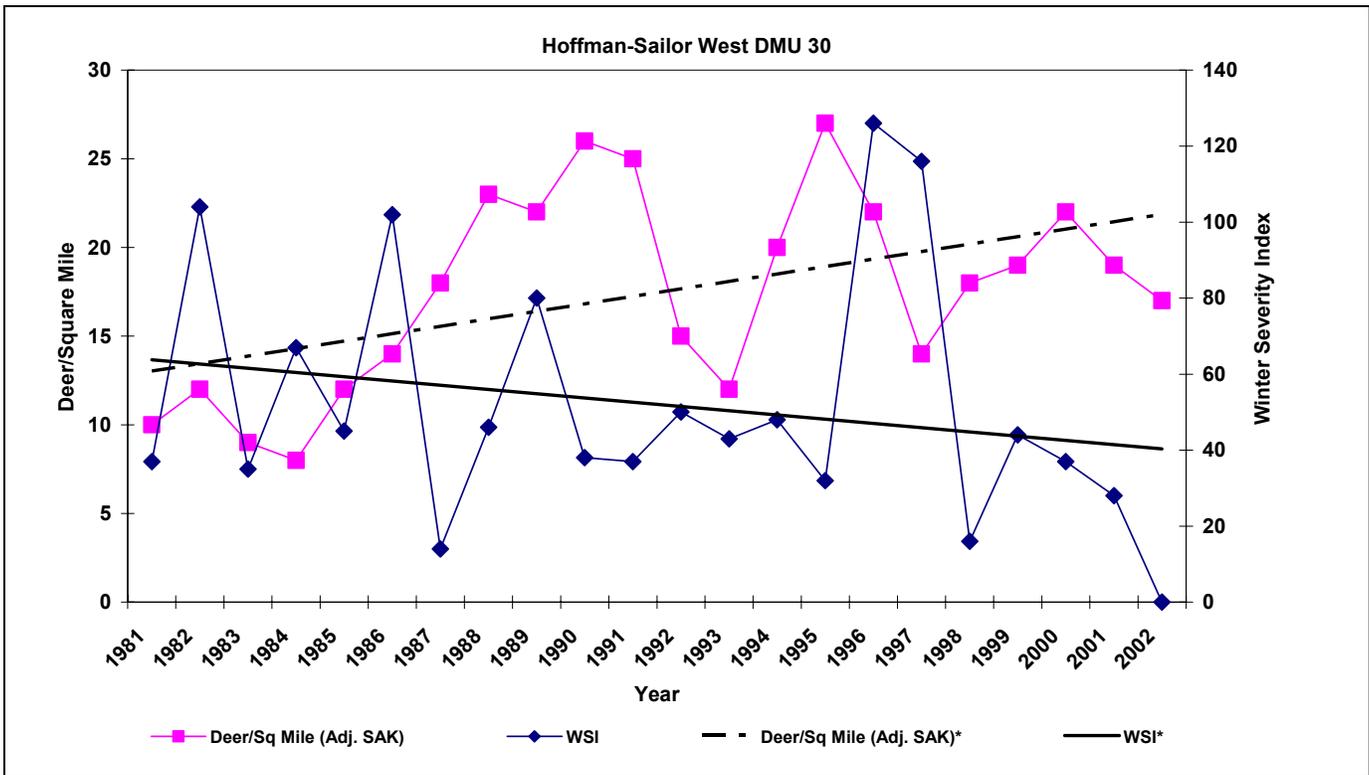
Several commenters on the DEIS expressed a concern that managing for aspen would result in white-tailed deer over populations. The increased deer numbers could in turn lead to herbivory and a decrease in plant variety across the forest. This issue was examined and found not to be a major issue for this project. See the project record report Specialist Report for Response to Comments Pertaining to Wildlife (10/8/2003) for further information. In summary:

The Hoffman-Sailor West project area falls within deer management unit (DMU) 30 as established by the Wisconsin Department of Natural Resources (WDNR). Per information from the WDNR, deer densities (deer per square mile) have exceeded goals for DMU 30 for many of the past years. While aspen clearcuts provide food for deer, this does not appear to be the limiting factor for deer population density. Using information on the amount of clearcutting that has occurred in DMU 30 each year, there is currently no direct correlation to deer density (see the chart below). Other factors playing a role in deer density could be baiting and feeding, deer harvest levels, and severity of winters.



During 1996 a total of 347 acres were clearcut within DMU 30. During the next winter, the deer density fell to 14 deer/square mile, dropping below the WDNR target level of 15 deer/square mile for DMU 30, and a reduction from a high of 22 deer/square mile the previous winter. This drop in the deer density, despite a readily available food source, highlights the fact that many other factors influence the deer herd population. It is very likely that the deer density dropped to 14 deer/square mile because of the severe winters of 1996 and 1997 that had Winter Severity Indices (WSI) sufficient to cause significant winter mortality of deer (WSI above 80 – 2001, Kubisiak et al, Sandhill Whitetails, Providing New Perspective for Deer Management, p 159). See the above graph.

The next graph illustrates that as the general trend of WSI has declined in the last two decades (more frequent mild winters), the deer density trend is increasing over the same time period. This deer density increase trend is occurring despite increased deer harvest levels incorporated by the WDNR such as “earn-a-buck” and “T-zone” hunts. All data used for these graphs, including deer density and WSI data, is from the WDNR, unpublished information.



For these reasons, the Hoffman-Sailor West clearcutting activities are expected to maintain quality deer habitat within the project area, but will not cause deer densities to be above the WDNR target level of 15 deer/square mile. While deer populations are slightly higher than WDNR target levels, significant effects on forest health as a result of deer herbivory are not expected. Some recent research information suggests that in a managed forest context, deer herbivory does not have a great adverse impact on ground flora or woody vegetation (2001, Kubisiak et al, Sandhill Whitetails, Providing New Perspective for Deer Management). Based on this research, which was conducted within fenced areas and included a complete deer herd removal, few changes occurred in the composition of vegetation. This research indicates that clearcutting may have indirect benefits by providing a preferred food source and reducing deer herbivory on surrounding undisturbed lands.

Usual deer home ranges are expected to be about 1 square mile in Wisconsin (Wildlife Management Institute, White-Tailed Deer: Ecology and Management, 1984, pp. 129-130). Due to this, even if any impacts from an increase in deer herbivory were expected, the effects would not extend significantly beyond the project area boundary. For this reason, cumulative effects analysis for deer was not projected beyond the project area boundary (DEIS, pages 51 and 52).

B18 Chronic Wasting Disease

Comments received on the DEIS indicated that aspen management for deer habitat could result in the spread of chronic wasting disease in white-tailed deer populations and potentially be a human health risk. Chronic wasting disease is a generally fatal, degenerative neurologic disease found in white-tailed deer, mule deer, and elk. Until recently, it was not found in populations east of the Mississippi. CWD has been found in southern Wisconsin. See Chronic Wasting Disease in Free-Ranging Wisconsin White-Tailed Deer (Joly et al., May 2003). The transmission route of the disease is unknown.

Chronic wasting disease (CWD) has not been found anywhere in northern Wisconsin, despite widespread testing during the 2002 deer hunting seasons. Baiting and feeding of deer is allowed in all of northern Wisconsin. There is great concern that baiting and feeding deer increases the risk and transmission of CWD, but it is not believed that natural feeding by deer is a threat. A July 3, 2002 WDNR question and answer sheet on Wildlife Feeding and Baiting Restrictions states: "Deer concentrations in timber sales, standing crops, and deer yards is considered a natural behavior and a much lower disease transmission risk than feeding. Artificial feeding is an unnatural activity, due to the repeated replacement of food in the same location and results in much more direct contact among deer and contact with potentially contaminated feed and ground. This contrasts with the more dispersed feeding in fields and yards, where the food is consumed and not replaced when a deer eats it." Additionally, the food consumed by deer in a normal forest setting (young trees or seedlings, branch tips, etc.) is largely off the ground, resulting in less risk of transmission through fecal matter or ground contamination.

In the February 21, 2003 Morbidity and Mortality Report published by the Centers for Disease Control and Prevention, no association between CWD and development of Creutzfeldt-Jakob disease (a fatal neurologic disorder in humans) was found. There is no evidence that CWD can be transmitted to humans, though continued surveillance of both diseases continues.

B19 Cougar

In response to the DEIS, one commenter was concerned that cougar was a rare species that could be impacted by the proposed projects. *Puma concolor schorgeri* (Wisconsin puma or cougar) is not a federally listed species nor is it considered a Regional Forester Sensitive Species for the Chequamegon-Nicolet National Forest. Cougar is not a Chequamegon MIS species. Cougar does have some ranking in the state of Wisconsin. It has a state ranking of "SH", which is defined as "of historical occurrence in Wisconsin, perhaps having not been verified in the past 20 years, and suspected to be still extant" (NHI Working list). There is no evidence or documentation of cougar in the project area or in the state of Wisconsin. There are several reports of cougar sightings every year, but it is suggested that many if not all of these are misidentification or captive escapees. There were 6 reports in 2002 of "probable" cougar sightings in Wisconsin, with the closest one greater than 15 miles from the project area (Rare Mammal Observations 2002, Wisconsin Department of Natural Resources, Wisconsin Wildlife Surveys, April 2003, Volume 13 – Issue 2 publication). Since cougar is not currently documented in Wisconsin, there would be limited potential to impact cougar populations. For these reasons, cougar was not considered further in this analysis.

B20 Nitrogen Leaching and Carbon Loss

There was a concern raised about the potential for timber harvest to release nitrogen that would be leached out of the soil and contaminate water. Regenerating stands will increase the uptake of carbon and nutrients like nitrogen. The removal of trees through timber harvest does increase nitrification by temporarily disrupting the "normal" cycle. However, the elements released, including nitrates, are utilized by remaining vegetation or retained in the root zone, therefore little loss of nitrogen from leaching is expected.

Another concern was raised about the release of carbon that could occur with timber harvest activity. Carbon sequestration has increased in the eastern US and this trend is expected to continue. Regenerating stands will increase the uptake of carbon and nutrients like nitrogen. Aspen grown on 40 year rotations in the Lake States has been estimated to sequester more than 3 times as much carbon as late-succession aspen ecosystems, with no loss of soil carbon from harvesting. (Chapter 6, "Managing the Invisible: Ecosystem Management and Macronutrient Cycling", Clive A. David, Ecosystem

Management, Boyce and Haney, Yale University, 1997). Risk of carbon release into the atmosphere as a result of harvest activity is expected to be low.