APPENDIX F: RESPONSE TO SCOPING COMMENTS

Table F-1: People Who Submitted Comments on the Kabetogama Project Scoping Report

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<td>Greg Lundin and Nels Lundin</td>
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<td>Bruce Barrett</td>
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<td>15</td>
<td>Kenneth Westlake and Kathleen Kowal, United States Environmental Protection Agency</td>
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<td>16</td>
<td>Lori Dowling-Hanson and Darrell Schindler, Minnesota Department of Natural Resources</td>
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<td>17</td>
<td>Bradley Sagen and Annah Gardner, Sierra Club</td>
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<td>Robin Twite</td>
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All comments received on the Kabetogama Project were reviewed by the interdisciplinary team and District Ranger. The following explains how public comments were categorized and addressed. Categories of comments include:

1. **Issues Considered in Alternatives**: An issue is a point of debate with a proposed action based on some anticipated effect(s). Issues may drive alternatives based on extent of geographic distribution of effects, duration of effects, and intensity of interest or conflict generated. Alternatives are other reasonable courses of action or mitigation measures not included in the proposed action (40 CFR 1508.25 (b)). Alternatives may be based on key issues or may be suggested by the public during scoping. The EA describes which alternatives will be analyzed in detail or analyzed briefly and eliminated from further study.

2. **Other Issues**: Other issues were considered but not analyzed in an alternative. Issues that were not analyzed in an alternative may already be addressed in the existing range of alternatives, be limited in the extent of geographic distribution of effects, duration of effects, and intensity of interest or conflict generated; or may be already addressed by law, regulation, or Forest Plan direction. However, in many cases, effects related to issues identified in this category are analyzed in the EA.

3. **Beyond the Scope**: Comments that raise issues that are beyond the scope of the Kabetogama Project and would not be relevant to meeting the Purpose and Need.

4. **Non-issue Comments and Questions**: Non-issues are comments that do not debate possible effects of the proposed activities. They may be questions, asking for more clarification of the proposed action.

5. **Comments Noted**: Some comments are statements of opinion or preference about the proposed actions. These are considered by the interdisciplinary team and provide
information on individual and group values and preferences relating to this project. However the scoping process is not a vote and comments are not used in that manner.

CATEGORY #1: ISSUES CONSIDERED IN ALTERNATIVES

Comment KS-003-2 (Dick Artley): Third, you say “roads will be built as needed.” Forest road construction is the human activity in the forest that harms resources more than any other activity. The harm isn’t worth the volume. Chief Dombeck knows this:

"Roads often cause serious ecological impacts. There are few more irreparable marks we can leave on the land than to build a road."

Dr. Mike Dombeck, Chief, US Forest Service
Remarks to Forest Service employees and retirees at the University of Montana
February 1998

Please do not construct any new roads for this project. If you do, then explain why you have chosen to cause serious ecological impacts and leave “irreparable marks … on the land.”

Response: The need to construct some temporary road miles is important so we can achieve management objectives as described in our Purpose and Need for the Kabetogama Project thus, moving vegetation in the project area from its existing condition towards the desired conditions described in the Forest Plan. (EA, p.1). As described in the EA, section 1.4 under, “There is a need to improve the Forest transportation system,” the project area generally has good access throughout but there is a need to provide six miles of temporary road for long-term management on federal lands and to allow access to other ownerships. All temporary roads would be effectively decommissioned. This could occur immediately following harvest for units with natural regeneration or several years after harvest for those stands receiving follow up treatments. For more information on Transportation and decommissioning, see the Forest Plan pp. 2-47-2-50.

We did briefly analyze an alternative based on this comment as described in Section 2.4, Alternative B of the EA. If we do not build any roads for the Kabetogama Project then the Purpose and Need for the project area would not be met; specifically, most of the 5,180 acres of primary treatments would not be accessible and treated. Furthermore, 474 acres of conversion, planting, or seeding and 664 acres of diversity planting would not occur. Most of the non-harvest primary treatments such as the riparian, oak-blueberry, and release would still occur, though with more difficult access and higher cost.

Comment KS-017-1 (Sierra Club): “Because of multiple ownership and past timber harvest practices the Kab project area requires active timber management. Our analysis reveals shortcomings in USFS Kab proposals and the need for additional alternatives. In particular, we believe USFS should consider an alternative that restores Kab from its current 60+% aspen to closer to the forest-wide 43%.

Cumulative effects are especially important in Kab. USFS controls only about 1/3 of the project area. The actions of other owners must be examined and factored into USFS decision making.”
Response: An alternative considered but not analyzed in detail to move the Kabetogama Project Area to 43 percent aspen is discussed in EA Section 2.4.

Cumulative effects were analyzed in Chapter 3 of the Kabetogama EA. See also Appendix E: Past, Present, and Reasonably Foreseeable Future Actions for information on cumulative effects.

Comment KS-017-4 (Sierra Club): The Kab EA should examine an alternative that restores Kab from its current 60+% aspen to closer to the forest-wide 43%. (And the forest-wide 43% itself represents an over emphasis on aspen.) “Diversity planting” is the term used in the SNF Pearl Project to supplement natural regeneration.

Response: See response to comment KS-017-1 and KS-017-3.

CATEGORY #2: OTHER ISSUES

Comment KS-003-1 (Dick Artley): “I appreciate the opportunity to provide scoping comments on the proposed Kabetogama timber sale. I’d like to refer to some statements on your July 1, 2014 “Dear Interested Public” letter.

First, you say one purpose of the timber sale is to “promote diverse…native vegetation communities.” Logging simplifies the forest and harms biodiversity. In the draft NEPA document please explain the problems with the current (pre-logging) biodiversity and how timber sale activities will improve it.

Second, you say “Forest management is not only important to people that use and care about the forest …” Most forest users are recreationists. I have copies of 18 national and state surveys of people chosen at random that indicate between 64% and 87% of the Americans surveyed do not want their national forests logged. Of course in USFS-speak “to manage” means the same thing as “to log.” In the draft NEPA document please provide data showing why logging is “important to people that use and care about the forest.” This statement contradicts all the polls and needs explanation.

Fourth, you say the Kabetogama timber sale will promote “healthy … native vegetative communities.” I have quotes from 312 independent Ph.D. biologists on file (not affiliated with the USFS) who describe scores of natural resource that are damaged by timber sale activities that occur for any reason at any location. In the draft NEPA document please include and cite literature describing how logging damages the natural resources in the forest … especially aquatic resources. Please don’t claim this literature does not exist. When I search on “logging” “resource” “damage” I get 20, 600,000 hits so the information is out there.”

Response: The Kabetogama Project would use a range of silvicultural methods to manage vegetation within the project area including even-aged harvest and other non-harvest management activities including prescribed fire, wildlife oak-blueberry treatments, riparian work, and diversity planting and seeding. As stated in Ch. 1 of the EA, p.10, some stands are healthy and vigorous while others show declining health due to insect and disease, old age, trees growing too closely together and competing for resources, or due to the soils being suited for other species.

As described by the variety of comments within this appendix, some members of the public support timber harvest and others oppose it. A number of laws guide our land management
practices and our Forest Service mission to “sustain the health, diversity, and productivity of the Nation’s forests and grasslands to meet the needs of present and future generations.” A few highlights of some of these laws include: the Organic Administration Act of June 4, 1897 which set aside and reserved national forests “for the purpose of securing favorable conditions of water flow, and to furnish a continuous supply of water and timber for the use and necessities of citizens of the United States”; the Multiple Use Sustained Yield Act of 1960 which states that national forests shall be administered for a variety of uses including timber, watershed and wildlife, and fish purposes; and the National Forest Management Act of 1976 which states that national forests shall be administered for a variety of uses on a sustained basis to ensure in perpetuity a continuous supply of goods and services to the American people. The Superior National Forest Land and Resource Management Plan which provides the framework for the Kabetogama Project, embodies the provisions of these laws as well as the regulations on forest plan implementation.

The effects of the Kabetogama Project on biodiversity and forest ecosystems are analyzed in Sections 3.2 through 3.6 of the EA.

Additionally, management activities within the High and Moderate Scenic Integrity Objectives areas would be implemented following the Desired Future Condition and Standards and Guidelines for Scenery as outlined in the Land and Resource Management Plan (Forest Plan p. 2-45 to 2-47). Vegetation management activities would:

- Enhance views, create vistas, and feature natural openings
- Retain canopy over travel routes
- Encourage vegetation diversity and seasonal color contrast
- Enhance big-tree appearance

The effects to recreation and scenery are analyzed in Section 3.11.2 and 3.11.3 of the EA.

**Comment KS-008-1 (Bill Latady, Tribal Heritage Preservation Officer Bois Forte Band of Ojibwe):** The project area is ancestral territory and there are numerous references for use of the Ash River area by Bois Forte Band members during the 19th and early 20th centuries. In talking with the Forest Archaeologist, current cultural resource survey within the area is dated and limited. For this reason I encourage the Kabetogama Project area be inventoried to current standards where appropriate by SNF Heritage Resource staff. Furthermore, Heritage Resource staff is invited to schedule meetings to discuss the results of their work with Band members on an ongoing basis, periodically reporting on their activities through meetings at Nett Lake and Vermilion Sectors of the Bois Forte Reservation.

**Response:** The Forest sincerely appreciates your comments with regards to heritage resources in the Kabetogama proposal. Heather Hoffman, West Zone Archaeologist, has reviewed the proposed undertaking against the Forest’s heritage resource site and survey database. Should the project move forward, the Forest fully anticipates conducting additional heritage resource survey in the project area. The Forest would welcome additional consultation with Bois Forte THPO staff pursuant to 36 CFR 800.4, identification of historic properties. The Forest is committed to consulting with the Bands to fully address potential heritage resource concerns prior to project implementation. The Forest is amenable to scheduling update meetings with Bois Forte THPO
as the project moves forward. Towards that end, please feel free to contact Heather Hoffman (218-626-4347) or Lee Johnson (218-626-4321) at your convenience. They would be happy to provide further information on the sites and anticipated survey needs relevant to the Kabetogama proposal.

**Comment KS-010-1 (Chuck Perkins):** Mr. Perkins inquired about the clearcutting proposed near his property and if a buffer would be left along the road (CR 518)?

**Response:** The team leader spoke with Mr. Perkins and indicated that she would talk with the IDT Silviculturist. The silviculturist called Mr. Perkins on July 17, 2014 and discussed a harvest design near his property and the likely visual outcome of the adjacent harvest. They also discussed the possibility of putting a legacy patch near his cabin for a visual buffer.

Generally, buffers are not left along roads in the sense of a continuous strip of uncut trees of a particular width. These areas are part of the stands that would be managed. However, during harvest layout individual trees or clumps of trees are typically left for various reasons and tend to break up the temporary opening created by the harvest.

**Comment KS-010-2 (Chuck Perkins):** Mr. Perkins also inquired if his cabin would be visible from the road?

**Response:** The team leader spoke with Mr. Perkins and indicated that she would talk with the Silviculturist. The Silviculturist called Mr. Perkins on July 17, 2014. They discussed harvest design near his property and the likely visual outcome of the adjacent harvest, in addition to possibly putting in a legacy patch near his cabin for a visual buffer.

During harvest layout trees are generally left for various mitigations, including wildlife habitat or legacy patches. In the case of adjacent private landowners, many of those trees are concentrated near the property line or dwellings to reduce visual impacts associated with the harvest.

**Comment KS-010-3 (Chuck Perkins):** Mr. Perkins inquired when the cutting would begin. He would be interested in meeting with someone in the field to ask questions and learn more about what is planned. He also indicated that his land slopes away from the road and water issues can occur during rain events.

**Response:** The team leader spoke with Mr. Perkins and indicated that she would talk with the Silviculturist. The Silviculturist called Mr. Perkins on July 17, 2014. They discussed the following:

**Timeline:** When the actual harvest operations may begin is dependent on a number of factors, but could occur starting in winter of 2015-2016. The forester in charge of the sale design would contact the landowner once layout begins and the sale administrator would contact the landowner before harvest operations begin.

- Discussed a field meeting at some point to better describe the planned activities but did not set a date. The Silviculturist would contact him when he plans on developing the prescription to set up a meeting.
- Discussed water issues and slope concerns. The team leader informed Mr. Perkins that soils and slope is something we consider and take seriously. We would not harvest if it would substantially increase water flow and cause erosion. Harvest layout considers
slope factors and hydrology and mitigations would be put in place to reduce possible impacts, including leaving trees in certain areas to slow overland water flow.

**Comment KS-015-1 (USEPA):**

Forest Planning

Information presented in Tables 5, 6, and 7 in the Scoping Document covers 2013 percentages of each forest type and age class in the Kabetogama project area and Forest wide. The tables also include percentages of each forest type and age class in the Forest Plan Objectives for Decade 2 (2024). We recommend these tables be revised to include percentages for each forest type and age class in the Kabetogama project area and Forest wide if the proposed project is carried out as planned. This information would be particularly useful in illustrating resulting percentages of each forest type and age class for the Forest Plan Objectives for Decade 2, providing contrast between existing (2013) and planned conditions.”

**Response:** Thank you for your comment. Please see Tables 1-2 and 1-3 in Chapter 1 of the EA and section 3.2-Vegetation for more information on vegetation composition and age class for the Kabetogama area and Forest wide. See Tables 3.3-1 thru 3.3-4 for the information, and the analysis assumptions in section 3.3.3.

**Comment KS-015-2 (USEPA):**

Water Resources

“What measures will be implemented to ensure waterbodies (e.g., Pearl and Ash Lakes) will not be negatively impacted by erosion or sedimentation associated with timber harvest and construction, reconstruction or use of roads?”

**Response:** As described in the Superior National Forest Plan and Minnesota Forest Resource Center (MFRC) guidelines, filter strips that provide a setback from potentially impacted water resources would be used to prevent erosion or sedimentation associated with timber harvest. The width of the filter strip varies with the land surface slope in the vicinity of the water resource. In addition, best management practices (BMPs) mandated across the entire National Forest System are implemented at potential erosion locations such as roads and timber harvest areas.

Monitoring of national BMPs and MFRC guidelines associated with roads and timber harvest has consistently indicated these measures have been successful at preserving the health of water resources on the Superior National Forest.

**Comment KS-015-3 (USEPA):**

Wildlife

“We acknowledge disturbance restrictions during nesting or denning seasons included in the Operational Standards and Guidelines applying to Federally-listed threatened or endangered species and Regional Forester Sensitive Species. We recommend the future EA indicate whether nesting and denning restrictions will apply to all species using the project area.”

**Response:** We understand your concern over nesting and denning for all forest species. In cases where specific Operational Standards and Guidelines (OSGs) are stated as applying to specific species, they do not apply to all species. Typically these OSGs are considered a ‘fine filter’
conservation measure for species of concern, whereas conservation measures that cover all species exist on a ‘coarse filter’ level, such as Management Indicator Habitat objectives. Forest Plan desired condition for wildlife as described on pp. 2-27 through 2-28 and objective O-WL-2 provide oversight and direction on managing the forest for enhancing and sustaining wildlife habitat for all species. For more information see the wildlife analysis in the EA, section 3.6-MIH habitats and the BE and BA.

**Comment KS-015-4 (USEPA):** “Acknowledging that whitetail deer management is the responsibility of the Minnesota Department of Natural Resources (MN DNR) and not the USFS, we recommend the future EA discuss current whitetail deer population numbers in this part of the state and MN DNR efforts to manage the deer herd to population numbers that will allow regeneration of the desired tree species. In particular, how might current deer management goals impact long-term project success?”

**Response:** According to the IDT wildlife specialist during the mid-level report out meeting, we need more young forest across the project area for wildlife. Species such as moose and deer require young forest. There is very little sign of moose or even deer activity in the project area. Project improvement such as harvest, riparian planting, and conifer for thermal cover will enhance habitat conditions for these species. We believe our action alternative strikes the right balance between creating new, young browse for game species, including moose and deer (young aspen/birch) and snowshoe hare (young conifer) and maintaining mature forest cover. The proposed management activities in the Kabetogama Project follow our Forest Plan landscape objectives, which are designed to move vegetation towards the range of natural variability. This includes increasing the percentage of young forest in the jack pine and spruce fir ecosystems, which would be achieved under the action alternative.

Please see the MN DNR webpage for more information on whitetail deer management within the state at: [http://www.dnr.state.mn.us/mammals/deer/mgmt.html](http://www.dnr.state.mn.us/mammals/deer/mgmt.html)

**Comment KS-015-5 (USEPA):**

Transportation System

“Discuss road placement and densities per square mile in terms of sensitive resources (e.g., riparian management zones, listed species, etc.).”

**Response:** We understand your concern regarding road placement and densities per square mile in terms of sensitive resources. Forest Plan desired condition for wildlife as described on pp. 2-28 through 2-31 (D-WL-4, D-WL-5, O-WL-7, O-WL-11, O-WL-14, G-WL-7, G-WL-8, G-WL-9 and S-WL-12) provides oversight and direction on managing the forest for enhancing and sustaining terrestrial and aquatic habitats. For more information on road density effects on wildlife see the BE and BA. An analysis of road density effects on water resources was completed in Section 3.8.

**Comment KS-015-6 (USEPA):** “Describe methods proposed for use to ensure decommissioned roads and temporary roads remain closed to motorized traffic as well as the success rate of the proposed methods. Additionally, what activities, monitoring, and management are proposed to rehabilitate returning encumbered lands (e.g., decommissioned road right-of-way) to resource production at the end of project-related activities?”
Response: Temporary roads are decommissioned once all treatments are completed that need to use the road. For example, on units where natural regeneration would occur, the road would be decommissioned immediately after logging is complete. When the road is needed to access the unit for mechanical site preparation, prescribed burning, or planting, the road would be decommissioned after those treatments are complete. When decommissioning temporary and unclassified roads, we scarify the surface of the road to promote further growth, and plant trees and alder brush to help blend in with the surrounding area. At the beginning of the road, we place rocks or install a berm to restrict any future traffic from accessing the road.

Superior National Forest road decommissioning techniques have a track record of effectiveness as documented in Forest Monitoring Reports (FY 2005, pp. 183-194 and 200-208; FY 2006, pp. 94-104; FY 2007, pp. 87-93). The 2008 Forest Monitoring Report states, “Contractual practices and techniques were effectively implemented for decommissioning temporary roads, including removal of drainage structures, removal of ruts and berms, reshaping and re-contouring, seeding and mulching, drainage control and effective road blockage.” Furthermore, over 80 percent of the projects were successful in preventing motorized recreation vehicle travel (Forest Monitoring Reports: FY 2005, pp. 183-194 and 200-208; FY 2006, pp.94-104; FY 2007, pp. 87-93). In addition, a recent review of temporary roads that were used for follow-up reforestation treatments showed a high incidence of closure success.

The requirements and techniques used to decommission roads are described in Appendix C under guidelines G-TS-15 and 16 and S-TS-2 (pp.15-16).

Comment KS-015-7 (USEPA): “Because it is relatively easy for non-native invasive species (NNIS) to become established following disturbance, we recommend the future EA discuss typical best management practices (e.g., washing equipment before it enters the project area) to reduce the possibility for NNIS to spread as a result of the proposed project. Additionally, will treatment of NNIS infestations along roadsides, at log landings, at timber harvest locations, etc. take place prior to and/or following timber harvest? What control methods will be proposed: manual, mechanical, chemical or a combination? We also recommend the future EA discuss monitoring and maintenance protocols that will be used following completion of proposed management activities to deal with NNIS in the project area.”

Response: The Kabetogama Project EA discusses the Operational Standards and Guidelines that are designed to minimize the spread of non-native invasive plants. The NNIP section of Chapter 3 discusses herbicide treatments that have taken place prior to harvest. The monitoring section of the EA describes NNIP monitoring that would take place, which could trigger further herbicide treatments if needed. See the NNIP section of Chapter 3 for more information.

Comment KS-013-1 (Greg Lundin and Nels Lundin): The commenters requested a buffer on the south side of CR 518. There have been incidents of people shooting from the road.

Response: See response to KS-010-1 regarding buffers along roads. Shooting firearms from the road is a law enforcement issue and outside the scope of this project. Retaining buffers along roads would not be a deterrent to the activity.

Comment KS-013-2 (Greg Lundin and Nels Lundin): When cutting near Ash Lake, would like the cutting to occur at different times to promote different age classes.
Response: Harvests near Ash Lake would have areas of residual trees for various reasons, including wildlife habitat, legacy patches, or seed source. The resulting stands would have trees of multiple ages throughout.

Comment KS-014-1 (Bruce Barrett): “Thank you for the copy of scoping report on the Kabetogama Project. Three issues I would like considered follow:

Utilize current access roads for timber harvest

Response: During the implementation of project activities, current National Forest System roads are utilized to the most extent possible. Nevertheless, sometimes additional roads need to be constructed and utilized to conduct vegetation management objectives on a temporary basis. Six miles of temporary road has been proposed to be constructed, and then decommissioned to conduct vegetation activities within the Kabetogama Project Area. Please see Table 1-7 in Chapter 1 and Tables 3.8-1 and 3.9-2 of the EA for specific information on road construction and decommissioning associated with this project.

Whenever possible the existing transportation system would be utilized to access harvest areas. In some cases additional temporary roads are needed. Temporary roads are generally less than one-quarter mile long (most are simply short spurs accessing a landing) and are decommissioned prior to sale closure, unless needed for reforestation activities, in which case they are closed to the public.

Comment KS-014-2 (Bruce Barrett): Leave buffer zone (no-harvest) along Co. Rd 518.


Comment KS-014-3 (Bruce Barrett): Consider timber harvest to create a successional forest as opposed to a one season cut.

Response: Please see the EA and specifically Appendices A and B for a listing of treatment types and unit specific management actions. A variety of silvicultural techniques will be used in the project area. See response to KS-013-3.

Comment KS-016-3 (MN DNR): “Additionally, where practical, we suggest avoid utilizing herbicide in timber stands with significant hard and soft mast production potential as herbicide can negatively impact mast production by killing mast producing species.”

Response: Please see the analysis on herbicides in Water Quality Chapter 3.8 and Appendix H for more information on the specifics of herbicide application. As stated in Appendix H – Herbicide Proposal, applications would follow Minnesota Forest Resource Council Site-Level Guidelines. Part of that guidance is to ‘Promote protection or growth of mast species and browse.’ While stands containing soft or hard mast could still have herbicide application, those species would be reserved and protected from application.

Comment KS-016-1 (MN DNR): “We ask that you also consider maintaining some stream riparian areas, which are not within designated trout streams, as aspen/birch cover types to provide habitat for beaver and the species that benefit from beaver-created wetlands, specifically moose and forest-wetland associated migratory birds. Natural permanent open-water basins are rare within the project area.”
Response: Riparian treatments are prioritized for stands comprised of old (aged 80-90+ years) aspen and birch. Aspen/birch stands of these ages are typically in decline and require management to prevent conversion to less-desirable species such as balsam fir. The remaining aspen/birch stands located along streams and lakes within the project area younger than the 80-90 year-old age class are of lower priority and would not receive management action with this project. Maintaining these younger areas would provide the habitat types for some of the species of concern mentioned, including beaver, moose, and migratory birds.

Comment KS-017-2 (Sierra Club): “Kab acknowledges that the current preponderance of aspen is at least in part the result of management practices. “White pine stands in the area are on the poorer sites due to past harvest practices favoring aspen on better sites…” (Kab, p.17) Kab appears to be substantially an aspen tree farm on higher terrain (with lowland conifer on much of the remainder).”

Response: While there is a substantial aspen component in the project area, we do not agree that the Kab project area is substantially an ‘aspen tree farm on higher terrain’. There are a variety of forest types. Forested stands (on National Forest System lands) in the Kabetogama Project Area are a mix of aspen, paper birch, red pine, white pine, jack pine, spruce, and balsam fir. Forest types vary in age from 15 to 183 years old with zero acres in the young (less the 10 years old) age class. See EA Sections 1.4 and 3.2 for more details.

Comment KS-017-3 (Sierra Club): “As a general position, Sierra believes that single species tree farms or plantations should be returned to a better representation of the diversity of typical native vegetation communities. Tree plantations are ecologically unstable and more susceptible to weather, fire and pests. Short term rotations and the use of heavy machinery expose soils to erosion. An area directed to providing timber does not contribute its full potential to the biodiversity and health of the forest.

We note that Kab relies heavily on a “coppice cut” as the preferred form of even age harvest. A coppice cut utilizes natural regeneration through sucker roots which means that aspen remains aspen.”

Response: Coppice cutting with reserves as described in Appendix A, p. 2 of the EA is a treatment prescribed for even-aged harvest primarily on healthy aspen stands to regenerate back to that species by suckering or sprouting from the roots versus seeding. A reserve patch of trees or legacy patch, if the harvested area is larger than 20 acres, is retained in the stand. The legacy patch is a minimum of five percent of the harvested area and must be representative of the harvested area. Typically, trees like red and white pine are reserved in these harvests as well as other species such as oak, yellow birch, and black ash, providing an open forested setting. For some stands the coppice cut would be followed up with piling of fuels and burning the piles, along with the release of existing pine/spruce or planting of pine/spruce, again to diversify the stand. The purpose of creating young patches is to restore conditions that more closely emulate landscape patterns that would result from natural disturbances and other processes. Please see Ch. 3.2-Vegetation for more information on disturbance patterns, vegetation, age class, and within-stand diversity objectives along with Appendix B for a unit list of treatments.

The characterization as single species tree farms is incorrect. These stands are dominated by one or two species in the overstory but have a number of other species present in varying amounts.
We agree that stands should be managed for diverse, productive, healthy, and resilient native vegetation communities (see Ch. 1 Purpose and Need, D-VG-1).

A coppice regeneration harvest (defined in Appendix A) does not preclude the use of other treatments to maintain or increase within-stand diversity. As shown in the Unit Treatment list, over 800 acres of stands that would be coppiced (about 1,360 acres) would also have follow-up treatments for that purpose (release or interplant and release).

**Comment KS-017-6 (Sierra Club):**

III. Tree Plantations – Red Pine

“In addition to single species aspen stands, Kab contains red pine stands best described as “tree plantations.” Most red pine stands on the Forest were established through planting. As the trees have grown, they have become more tightly spaced with little growing room for the planted trees or light for any other forbs, shrubs or other trees species". (Kab, p.8)

**Response:** The Kabetogama Project Area does contain a larger amount of conifer stands than in some other project areas on the Forest, particularly red pine stands. Proposed activities would not enhance the monoculture/plantation-type vegetation management approach that exists in some stands. Rather, we desire to enhance species and structural diversity along with restoring species that are in decline. Thinning these stands removes the dead and dying trees while obtaining other objectives such as meeting the supply for timber products. Opening up these stands improves the growing conditions for the remaining trees and allows for light and nutrients to be more readily absorbed for existing seeds within the soil to sprout, adding diversity to the stand. Heavier thinning would occur in hardwood areas of these mixed pine stands to promote natural white pine regeneration.

When developing the proposed action, the IDT considered opportunities for restoring diversity and proposed those treatments where appropriate. However, this action is not always needed. For example, a 20-acre patch of red pine in the middle of a 200-acre mature patch of aspen is providing diversity to the patch at the landscape level and is contributing to the natural range of variability found within patches. The Kabetogama Project Area is largely within the General Forest Management Area. For this management area, we proposed to restore 488 acres without harvest, including reforestation and planting. Approximately 1,138 acres project-wide is proposed to increase within-stand diversity in harvested stands through planting or seeding. Appendix B of the EA displays which units would be reforested or planted as secondary treatment.

**Comment KS-017-7 (Sierra Club):** “Kab proposes to ‘treat’ red pine problems almost entirely by thinning. Thinning does not necessarily promote desirable species diversity. By eliminating all other plant species, changes in the nutrient cycle and in the original soil structure may occur and may be irreversible. Tree plantations often do not leave the coarse woody debris essential for healthy soil conditions.

Forest health is enhanced by large downed trees that can provide food and shelter for animals and habitat for plants such as fungi.
In addition to thinning, Kab should undertake management practices designed to promote species diversity in red pine stands. This may require variations of clear cut to establish more diverse stands.”

**Response:** See response to comment KS-017-6 and treatment descriptions in Appendix A. As stated, the intent is to improve growth, enhance forest health (which includes resiliency to changes in climate), or recover potential mortality. We agree that depending on the objective, thinning may not promote diversity. However, we take a balanced approach to thinning treatments. Typically, areas would be left without treatments for a number of reasons, including operability issues, species and structural diversity, or wildlife habitat. Removing all species other than red pine does not fit within the intent. In fact, other tree species would be retained except for those harvested for skid trails or access, and red pine would be the dominant species harvested. This would create conditions better suited for the remaining red pine trees but would also benefit many other species, including herbaceous plants, woody shrubs, and other tree species. Nearly all of the red pine stands that would be thinned are between 25 and 40 years old, and have not begun to generate coarse woody debris. The areas reserved from treatment would begin this process sometime in the distant future. Additionally, some trees within the harvest boundary would be reserved for current and future wildlife habitat, including snag and coarse woody debris recruitment. Forked or poorly formed trees generally are not valuable timber commodities and make good wildlife trees. Some may be cut if they compete directly with a high quality tree, but many are left behind and do not interfere with the growth of higher quality trees on site.

**Comment KS-017-8 (Sierra Club):** “Many of the even age treatments are grouped in a more or less contiguous area. Stands (beginning) 60-, 64-, and 65- establish a contiguous clearcut approaching 1,000 acres Sierra understands the current SNF clearcut limit to be 1,000 acres. The stands 60-, 64-, and 65- fail the spirit if not the legal limit of contiguous clear cuts and should be broken up by other treatments and by allowing stands to remain and provide wildlife corridors and habitat.”

**Response:** The District Ranger reviewed the specific units to be harvested and adjacent stands. The District Ranger considered the Forest Plan standards and guidelines, as well as the Forest Plan definition of temporary opening.

In this case, there are 16 stands within a roughly 1,276 acre block of National Forest and private lands that would be harvested by clearcut, seed tree, or coppice cut techniques. These stands total 1,156 acres. Forest Plan standard S-TM-2 limits temporary forest openings to 1,000 acres, with some exceptions. None of the 16 stands would be treated in entirety. Each stand’s harvest treatment includes reserves, both to meet G-TM-5 requirement of a minimum of 5 percent reserve legacy patches and to accommodate inoperable terrain. Meaning, not all 1,156 acres would be harvested or become a temporary forest opening. Specific reserved areas are determined during timber sale layout and design, after the NEPA decision; however, to ensure compliance with S-TM-2 and limit the temporary opening created by these treatments, the mitigation described below would be used.

As the area is bisected by St. Louis County Road 518, the District plans to split the treatments into two separate timber sales. One sale north of CR 518 encompasses 682 acres, of which 602 would be treated with a combination of clearcuts, coppice cuts, and seed tree harvests. Again, a
portion of these acres would not be harvested as legacy patches, inoperable ground, or other reserves. A second sale south of CR 518 encompassing 554 acres would be harvested with a combination of seed tree and coppice cuts. All treatments would include reserve areas resulting in a temporary opening less than 554 acres.

Via a required mitigation measure, during layout and design of both timber sales reserve areas, total acres would be tracked and calculated. Should the maximum planned harvest acres not exceed 1,000 acres, the sale would move forward as designed. However, should the reserve and legacy patch not reduce the planned harvest acres below 1,000 acres, then all or a portion of unit 60-068 would be dropped from harvest. Doing so would leave an unharvested buffer between the north and south sales and associated temporary openings.

**Comment KS-017-9 (Sierra Club):**

V. Biomass

“Biomass is a vital component to a healthy forest because it provides future nutrients to the soil and important habitat for wildlife. In general, Sierra discourages the use of public lands to collect woody biomass for generating thermal and electric energy.”

“Kab appears to anticipate the generation of significant biomass for commercial use (Kab, p.8). Sierra reads the conditions governing biomass to limit amounts generated, especially in lands dominated by aspen (BM 3, 5).

Monitoring of Biomass conditions will be important. The EA should describe how the requirements governing biomass removal will be monitored.”


In addition to MFRC guidelines, we are following Superior National Forest guideline G-WS-8 (pp. 2-16 and 17 of the 2004 Superior National Forest Land and Resource Management Plan) which states the soil types that do not allow biomass removal. Furthermore, the stands from which biomass is actually removed may be less than what is allowed for in the Kabetogama Project. The process is dependent upon the operator owning the specialized equipment. At this time we have one logger who has a chipper capable of processing biomass (personal communication, S. Nelson-Timber Sale Administrator). All of this considered, the amount of biomass that is removed from a given stand depends on meeting all the guidelines, primarily the soil type, the type of management in that stand (conifer / hardwood, length of rotation) and if there is an operator (logger) who is interested in the biomass with the equipment to process it.

Timber harvest or biomass removal that could occur Forest-wide was considered on a programmatic level in the Forest Plan Environmental Impact Statement. Additionally, Forest Plan direction such as G-WS-8 was designed with this consideration in mind to conserve soil resources. The reference to biomass on page 8 of the Kabetogama scoping report is this: “Treatments to meet other objectives could be accomplished through the sale of marketable wood products, including tops of trees for biomass.” Biomass removal could occur on appropriate sites (defined by the Forest Plan as sites suitable for whole tree logging, Table G-
WS-8) when it meets an objective, generally fuels reduction or slash reduction to facilitate better natural or artificial regeneration, including conversions from aspen to other forest types. Biomass implementation monitoring is part of sale layout and harvest monitoring, see Appendices C and D.

**Comment KS-017-10 (Sierra Club):**

VI. Herbicides

“In general, Sierra does not support the use of herbicide treatments. Toxic chemicals will negatively impact sensitive plants, animals, and environments. Proposed mitigations are generally inadequate to assure that these chemicals will not have serious effects on the surrounding landscapes.

The proposal for herbicide use in Kab is vague concerning the magnitude of use. Presumably herbicide could be applied to all or none of the areas designated for “release” as a treatment. The EA should describe the specific land areas to which herbicides will be applied and the reasons for application to that area.”

**Response:** Utilizing herbicide through spot application on non-desirable species to release desired species such as long-lived conifers is proposed for some stands on NFS lands within the Kabetogama Project Area. Herbicide application is proposed as a tool to be utilized in conjunction with other vegetation management activities. For more information on herbicide application see Appendix H-Herbicide Proposal.

Herbicide could be used as a tool in stands identified for release. Stands that would have a release treatment are specified in Appendix B to the EA in the primary or secondary treatment columns. Stands that could include herbicide use total 119 acres as listed in Tables 1-4 and 2-1 in Chapters 1 and 2. Not all of these stands may include herbicide application.

Planning level stand examinations are not adequate for detailed prescription development. During individual stand prescription development, a close look at each site will determine whether herbicide is the appropriate tool to reach the objective. For example, in stands with many acres of riparian edge or wetland inclusions, mechanical release would likely be a better tool to eliminate the potential impacts of herbicide on these sites.

**Comment KS-017-11 (Sierra Club):**

VII. Roads

“Sierra, in general, does not support the building of additional roads. This is especially true of the proposal for additional permanent roads in Kab. Roads lead to soil and water damage, spread of non-native invasive species, ATV trespass and loss of wildlife species, especially lynx.”

“The additional “A1-A6” permanent roads proposed in Kab are almost entirely stubs to access USFS property. We do not see the need for additional permanent connections since the termination tracts can be accessed by other routes. (Establishing additional access for hunters is not a legitimate purpose for road construction when other means of access are available.)”

**Response:** None of the roads proposed as permanent additions to the national forest transportation system in the Kabetogama Project are new physically constructed roads. Rather they are existing ‘unclassified’roads that are needed for long-term purposes. Some reasons to
need access include pine stands in need of regular thinning or other treatments, access to gravel pits, or access to other ownerships. Proposed additions will actually be partially decommissioned at the point in their length where they are not necessary. So in fact we are actually reducing the amount of physical road on the landscape, while increasing the amount of road designated as part of the national forest road system. See EA, Table 1-7 for the physically existing, unclassified roads proposed for administrative designation as part of the national forest road system, and the existing road segments proposed for physical decommissioning.

**Comment KS-017-12 (Sierra Club):**

VIII. Moose Habitat

“Sierra supports efforts to provide better habitat for moose. A move from clearcutting and commercial harvesting of aspen to focus on increasing conifers will diversify stand complexity and provides better thermal cover for moose. The present fragmented forest, with constant harvesting and management prescriptions, does provide many areas of young forest and brushlands with browse. It is important to keep some of these young forest areas as a component of moose habitat. In addition, areas that provide good thermal cover and protection of wetlands and marshes should be a priority.”

“Sierra applauds the Kab emphasis on improving moose habitat and the area moose population. Massive clearcutting does not favor moose. Less emphasis should be placed on even age harvest variations of clear cutting. More stands and corridors should be allowed to remain.”

**Response:** Effects to moose, including from even-aged harvest, are summarized in Section 2.6 of the EA. Thermal cover would continue to be available to moose under both alternatives. Diversity planting of conifer is planned on 664 acres to increase stand complexity and provide long-term thermal cover for moose.

**Comment KS-017-13 (Sierra Club):**

IX. Cumulative Effects

“USFS controls only about 1/3 of the project area. Cumulative effects are especially important in Kab because of multiple ownership. The state has large tracts and is oriented toward timber harvest for profit by maintaining large stands of aspen. Private landowners appear to have similar goals. Attaining a desired forest condition cannot be achieved alone by USFS. In Kab, USFS may have to compensate for inappropriate actions of others. USFS must examine the cumulative effects of timber harvest/management by multiple owners and adjust its own actions if necessary to achieve desirable conditions for the entire project area.”

**Response:** A cumulative effects analysis is included in Chapter 3 of the EA. See also Appendix E.

**Comment KS-017-14 (Sierra Club):** “The cumulative effects of USFS permanent road construction in Kab should be examined carefully. The EA should present a map and description of all roads and motorized trails in the project area and describe the intentions of other property owners as best these can be determined. State lands are of particular importance because of the loose state regulations allowing hunter/trapper access across open lands.”
Response:  There is no permanent road construction proposed in the Kabetogama Project. See response to Comment KS-017-11 for explanation of additions (data cleanup) to the road system and Appendix E for Past, Present, and Reasonably Foreseeable Future Actions.

Comment KS-017-15 (Sierra Club):
IV. Over-Emphasis on Even Age Harvests Involving Variations of Clear-Cut

“Kab relies heavily on even age harvest variations of clear cut. We have remarked already on the substantial use of coppice cut that will result in an even age stand of aspen. Perpetuation of aspen ‘tree farms’ is undesirable in our view. If even age harvest is required, replanting to white pine should receive careful consideration. Proposed coppice cuts and other even age harvest treatments should be re-examined to determine if a substantial proportion can be converted to white pine or species other than aspen.”

Response:  See responses to KS-017-1, KS-017-2 and KS-017-3.

CATEGORY #3: BEYOND THE SCOPE

Comment KS-016-2 (MN DNR): “There are currently no developed Forest Service recreational areas within the project area. As aspen/birch cover types are common within the project area, consider developing a Ruffed Grouse Management Area and associated hunter walking trails to provide additional recreational opportunities. It is possible that the MN DNR and Ruffed Grouse Society could cooperate on the development and management of this type of recreation facility.”

Response:  We appreciate the MNDNR’s suggestion to consider developing a new Hunter Walking Trail in the project area. Generally in recent years, the Forest has not been able to develop new trails or facilities without the cooperation of partners and/or other agencies. The Forest Service, MNDNR, and Ruffed Grouse Society have been successful in trail partnerships in other locations on the Forest. If the MNDNR, Ruffed Grouse Society, or others are interested in partnering with the Forest Service to plan, build, and maintain a new hunter walking trail in the project area, we would be willing to consider a proposal and the additional partnership.
CATEGORY #4: NON ISSUE COMMENTS OR QUESTIONS

Comment KS-001-1 (John Perko): Mr. Perko received the scoping letter in the mail on July 3, 14. He inquired about the map. He lives on Ash Lake on Jacobs Rd.
Response: The project leader notified Mr. Perko that the map and project information were available online. He indicated that he would look online and if he had questions he would call back. No further comments were received from Mr. Perko.

Comment KS-002-1 (Val Cook): Mr. Cook received the scoping cover letter and requested a copy of the scoping packet.
Response: A hardcopy of the scoping packet was sent to Mr. Cook on July 3, 2014.

Comment KS-004-1 (Dan Mundt): Dan Mundt’s office requested a hardcopy of the scoping packet.
Response: A hardcopy of the scoping packet was sent to Mr. Mundt on July 15, 2014.

Comment KS-005-1 (James Crego): Mr. Crego requested a copy of the project map.
Response: A hardcopy map was mailed to Mr. Crego on July 10, 2014.

Comment KS-006-1 (Mike Borass): “Please keep me on you mailing list for information regarding the Kabetogama Project.”
Response: Mr. Borass will remain on the mailing list.

Comment KS-007-1 (Wayne Johnson): Mr. Johnson owns property (80 acres) south of Ash Lake west of Highway 53. He wanted to know what to do with the letter he received.
Response: The project leader spoke with him to let him know he received the letter because he owns property adjacent to the project area. Mr. Johnson had no questions, comments, or concerns.

Comment KS-009-1 (Fred Wolff): Mr. Wolff requested a project map.
Response: A map was provided to Mr. Wolff on July 14, 2014.

Comment KS-011-1 (Terrance Skraba): Mr. Skraba requested to remain on the project mailing list.
Response: He will remain on the mailing list.

Comment KS-012-1 (Dan Klocek): Mr. Klocek requested a copy of the project map.
Response: A map was mailed on July 18, 2014 to Mr. Klocek.

Comment KS-013-3 (Greg Lundin and Nels Lundin): Both commenters would like to remain on the mailing list.
Response: They will remain on the mailing list.

Comment KS-013-4 (Greg Lundin and Nels Lundin): Would like 1 or 2 culverts put in of FR 615 that go out in the lake and turn down to keep the beavers from rebuilding the dam.
Response: Construction plans under the Kabetogama Project for Forest road 615 at mile post 1.2 are to reclaim the road prism as it was in the past. Our plans include the removal of old beaver debris, hauling in new road material, and installing a culvert in conjunction with the installation of a Clemson Leveler to relieve beaver activity.

Comment KS-018-1 (Robin Twite): Contacted project leader with requests to stay on the mailing list.

Response: He will remain on the mailing list.

Comment KS-014-4 (Bruce Barrett): Please mail me a hard copy of the completed Kab Project EA. Thank you for the opportunity for input.

Response: A hard copy of the EA will be mailed to Mr. Barrett.

Comment KS-017-5 (Sierra Club): “USFS should provide in the EA, if at all possible, one or more maps showing the landscape ecosystems and the age class distribution in the project area (all lands – not just USFS holdings). USFS was able to do this in the Glacier Project where Scope Map 4 showed landscape ecosystems for the entire project area, and Scope Map 2 showed the age class distribution for SNF lands. (Age class for all Kab lands is preferred.)”

Response: A map of landscape ecosystems for the Kabetogama Project was published in both the scoping report and in this EA, Ch.1. Additionally, see the EA Ch. 3.2-Vegetation for more information on landscape ecosystem analysis for the project.

CATEGORY #5: COMMENTS NOTED

Lori Dowling-Hanson and Darrell Schindler, MN DNR

“The objectives set forth by this plan appear to be in agreement with DNR fisheries management objectives for designated trout streams. Pages 8-9 in the Scoping Report specifically state a forest plan objective to “…favor management for long-lived tree species (such as white pine, red pine, black spruce, tamarack, etc.) suitable for the site, at stand densities suitable for the site.” With beaver control and thermal habitat limitations being the most challenging aspects of trout stream management in this area, it will be beneficial for forest management activities to work toward meeting the listed objective. Forest management activities favoring the listed long-lived coniferous species in the riparian area of the designated trout streams would discourage beaver activity and promote the growth of long-lived trees that are essential to shading in these trout streams.”

Response: Comment noted.

Bradley Sagen and Annah Gardner, Sierra Club

“In summary, Sierra recommends:

1) USFS should consider an alternative that restores Kab from its current 60+% aspen to closer to the forest-wide 43%.

2) USFS should provide in the EA, if at all possible, one or more maps showing the landscape ecosystems and the age class distribution in the project area (all lands – not just USFS holdings).
3) Proposed coppice cuts and other even age harvest treatments should be re-examined to determine if a substantial proportion can be converted to white pine or species other than aspen.

4) (In addition to thinning) Kab should undertake management practices designed to promote species diversity in red pine stands. This may require variations of clear cut to establish more diverse stands.

5) The Stands 60-, 64-, and 65- fails the spirit if not the legal limit of contiguous clear cuts and should be broken up by other treatments and by allowing stands to remain and provide wildlife corridors and habitat.

6) The EA should describe how the requirements governing biomass removal will be monitored.

7) The EA should describe the specific land areas to which herbicides will be applied, and the reasons for application to that area.

8) The additional “A1-A6” permanent roads proposed in Kab are almost entirely stubs to access USFS property. These additional permanent connections are unnecessary since the termination tracts can be accessed by other routes.

9) (To improve moose habitat) Less emphasis should be placed on even age harvest variations of clear cutting. More stands and corridors should be allowed to remain.

10) USFS must examine the cumulative effects of timber harvest/management by multiple owners and adjust its own actions if necessary to achieve desirable conditions for the entire project area.

11) The cumulative effects of USFS permanent road construction in Kab should be examined carefully. The EA should present a map and description of all roads and motorized trails in the project area and describe the intentions of other property owners as best these can be determined.

Sierra Club requests notification regarding any further opportunities for public comment, meetings or field trips concerning the Project.”

Response: Recommendations noted and addressed in response to comments KS-017-1 through KS-017-13. We will keep you on our mailing notification project list.