

Mr. Anthony Scardina - Forest Supervisor  
Ottawa National Forest  
E6248 US 2  
Ironwood, Michigan 49938

Re: Delich Land Exchange Proposal

Dear Supervisor Scardina,

We are writing in opposition to the proposed exchange of Ottawa National Forest (ONF) lands for private lands analyzed in the Delich Land Exchange Proposal Environmental Assessment (EA). These comments are submitted on behalf of Habitat Education Center (HEC) and are intended for inclusion in the public record for this project. Staff and supporters of HEC appreciate the opportunity to provide comments on this important proposal. We have used and enjoyed the natural areas, waterways, wildlife, and other amenities found on the ONF for decades and have a long-term interest in proper management of the forest.

HEC believes that land exchanges can be a very useful tool for consolidating public land holdings, improving timber management, protecting natural features, and achieving other land management goals. However, land exchanges must be evaluated on the basis of each sites' ecological, economic, and social value; they cannot be based upon net changes in acreage of traded parcels alone. Unfortunately, many of the values of individual parcels are difficult to identify and/or quantify thus making their comparison with other parcels more complicated.

As currently proposed, the Delitch Land Exchange proposal would result in a net gain of approximately 100 acres of public land within a designated semi-primitive area in the ONF, thereby consolidating public holdings and moving the area towards the desired future conditions identified in the forest plan. The project EA identifies five goals that would be supported with the land exchange (p. 7):

1. Minimize the potential adverse impacts of invasive plant species that might occur with the alternative use of the Non-Federal parcel, which is subdividing and development (Goal 1);
2. Provide an opportunity for more efficient timber management and for public use by conveying several parcels of land where the Forest Service has no legal access, while acquiring lands where Forest Service has legal access (Goals 2 and 4);
3. Protect an otherwise large expanse of public land from conversion to other uses (Goal 3);
4. Consolidate National Forest System Lands within a Semi-Primitive Non-Motorized Management Area (Goal 3); and
5. Reduce the potential risk of trespass and encroachment associated with interspersed ownership (Goal 5).

These are important overall goals for management of the ONF. However, in this case only goals 2 and 4 fall fully within the jurisdiction of the FS. Whether or not the other three goals apply or will be achieved depends on the actions of the parcel owners. Moreover, simply because a parcel owner professes a desire or intention to develop lands does not mean that will ever happen. Only by assuming worst case scenarios do the benefits of points 1,3, and 5 actually occur. Consequently, cost/benefit analysis for the Delitch Land Exchange should weigh each listed benefit by likelihood of occurrence when comparing parcels.

Public lands offered for exchange have much higher ecological values at the current time, than does the Delitch parcel. Several of the federal parcels contain high-value hemlock and cedar stands with old-growth characteristics. Groundwater discharge areas in riparian areas contribute to the high quality wetlands in these parcels. Unusual aquatic features also include minor waterfalls and isolated seeps containing unique microsite habitats.

The loss of hemlock and cedar stands that would occur with this land exchange is more than enough reason to select the no action alternative. Both of these important northwoods species are experiencing reproductive failures across the upper Midwest, including in the ONF. Loss of public jurisdiction over the tracts that contain these forest types and natural features would be a significant change and would place these areas at risk. Moreover, the lands proposed for acquisition by the ONF do not contain equally rare or unusual natural features. The Delitch parcel was heavily logged in the recent past and this logging damaged streams and eliminated many characteristics of mature forest on the tract. Thus, the exchange would end up reducing both beta and gamma-scale diversity on the ONF for decades.

We are also concerned about the use of habitat for marten and goshawk as justification for this exchange. Lands currently owned by Mr. Delich do not represent high quality habitat for these species. In fact, new evidence from Wisconsin suggests that marten use of remnant hemlock and cedar inclusions with coarse woody debris is very significant. On the other hand, low quality northern hardwood stands lacking accumulated large woody debris do not support marten alone. Thus, the proposed exchange would result in a loss in ecological types known to support marten and which are declining across the northwoods for a gain in acres of a common forest type in the ONF without significant natural features.

On this basis, we urge you to select the no-action alternative (Alt.1) at this time. There are many possible alternative land exchanges that would move the forest towards the desired future conditions without sacrificing high quality ecological types for cut-over lands. We urge you to rework this land exchange in ways that protect the high quality public tracts while acquiring important parcels.

Thank you for the opportunity to comment on this project. Please contact us if you have any questions.

Sincerely,

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