

To: Sue Spear, Ottawa National Forest
From: PARTNERS in FORESTRY Landowner Cooperative
Delich Environmental Assessment (EA) Comments Ottawa National Forest

Benefits of the Exchange: We recognize the benefits of the proposed exchange, and we have no concerns with Forest Service (FS) ownership of the acquisition parcel now owned by Delich.

1) It would consolidate FS ownership overall, by exchanging out of several smaller tracts, and acquiring one large (400+ acre tract) near the Porcupine Mountains. (Porkies), which would block-in FS ownership in that section of land.

2) It would increase FS ownership within Mgmt. Area (MA) 6.1, which is a Semi-Primitive Management area.

Drawbacks to the Exchange:

In the opinion of the board of directors of Partners in Forestry (PIF), more of its members and director Joe Hovel this transaction was a serious consideration and warranted a closer look in the summer and fall of 2009. From these visits, studying the EA and other scoping comments we have the following conclusions.

- 1) The 400+ Delich parcel near the Porkies has been heavily cutover by the owner in recent years. This type of management is basically a commercial clearcut, where virtually all merchantable-sized stems were removed, except for some patches of hemlock in the wetter areas. All appearance is that this stand was previously a very nice young pole- to small sawlog- sized hardwood stand – mix of sugar and red maple with scattered red oak, and some hemlock and other conifers. The only thing remaining now is sapling-sized maple whips, and patches of hemlock in wet areas. Aspen is attempting to regenerate, but most of it will not survive under the shade created by the maple saplings. The logger also did some damage to the site by logging during a period of time when the (heavy clay) soil was wet, resulting in some deep rutting across the area. Crossing of small streams on the parcel was also not done properly, resulting in damage to these riparian areas from logging equipment. This area and these timber stands should have been managed with a selective harvest, and logged during the proper time of year. Proper practice would have avoided site damage and long-term damage to the timber resource. The PIF board does not endorse or accept this poor quality type of forest management, either on member lands or on public lands.
- 2) The site will now largely regenerate to brush and a few patches of aspen (where sunlight is adequate). It will be decades before a young hardwood stand can be restored on this site, and even that will take some intensive work (removing the existing poor-quality maple whips, as one example).

- 3) Although the parcels FS is proposing to trade away in this exchange are smaller and somewhat scattered, many of them contain some valuable timber and other important resources. All of the County Line Lake (CLL) parcels, for example, have older, sawlog-sized sugar maple stands on them, of good quality. The CLL parcels on the west side of County Line Lake road have old-growth characteristic hemlock and cedar mixed in with large sugar maple, making them very unique stands. In addition to the timber value, these areas provide habitat for numerous wildlife species that are associated with old-growth mixed hardwood/conifer forests, such as American marten, barred owl, and goshawks, to name a few. The parcel near Lake Gogebic contains some areas of younger upland hardwood stands and some areas of lowland hardwoods. The parcel north of M-28 was harvested approx. 15 years ago, and has a vigorous stand of young aspen regenerating. The timber resource tables in the EA on table 5, page 39 are very graphic and point to an honest picture of the loss of quality saw and pole timber. If management is an issue of concern for FS, we may well concur with scoping documents by Marion True, suggesting old growth designation.
- 4) Mr. Delich is proposing to divide and fragment several of these parcels (presumably after heavily logging them) if the exchange is approved, and sell them for residential development. This would lead to a loss of productive forest land, and also fragmentation of the remaining Forest. It would also add unwanted development in the CLL area as it appears many of the adjacent landowners are opposed to the exchange for this reason. (One could brush them off as NIMBY's, however they know the area and have placed a great deal of trust in FS management). It may also lead to negative impacts to water quality in County Line Lake itself, as one parcel is very close to the shore of the lake. Residential development, including paving of roads and driveways, etc, can increase runoff of pollutants into wetlands and lakes, adversely affecting water quality.
- 5) Two of the FS parcels west of County Line Lake road have a portion of Scott and Howe Creek going through them. Scott and Howe Creek is a high-quality smaller trout stream, with some very unique habitats along portions of its bank (unusual rock outcrops, for one). There are also some high-quality wetland habitats along portions of the stream riparian area. Finally, there is a very nice scenic waterfall on the creek in one of these parcels – Wildcat Falls. This is a picturesque small waterfall that is used by local people and Forest visitors, who have hiked into it and picnicked there for generations. Wildcat Falls is listed on the Ottawa NF website as an interesting waterfall that the public should visit while recreating on the Forest. Why would FS want to trade out of a parcel that has such a unique feature? To excuse this trade by stating that there are other waterfalls on the forest is not sound justification.

Summary:

It is the unanimous opinion of the PIF Board of Directors that the drawbacks of this proposed exchange outweigh the benefits, and therefore the proposal, as displayed,

should be rejected. The unique timber and other resource value of the CLL parcels, in particular, should have eliminated them as parcels to be considered by FS for exchange to begin with. Also, the FS should not be promoting land exchanges that will result in a loss of productive land, fragmentation, and additional development within the Forest. We recognize there is value in FS seeking to acquire the 400+ acre Delich parcel (primarily from the standpoint of FS blocking-in ownership of that whole section), but too much would be given up in exchange in this proposal. The Delich parcel has been damaged by improper logging, and will not support a viable stand of timber for many decades as a result.

We urge you to reject this exchange as proposed, as not being in the public's best interest, and look for another avenue to acquire the Delich property. This is NOT like kind property, and the long term public values are too extensive to be lost. You are also bound to a certain public trust which is likely to be breached in the event of this exchange. Thank you for the opportunity to comment on this proposal.

Joe Hovel, for Partners in Forestry COOP, and as an individual in his own right.

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Partners in Forestry is a landowner and forestry concerned member organization in northeastern Wisconsin and the western Upper Peninsula of Michigan. We recognize the value of sustainable forest management on private and public lands and appreciate the value of the greater forest landscape and its benefits to society.

WILDCAT FALLS on the OTTAWA

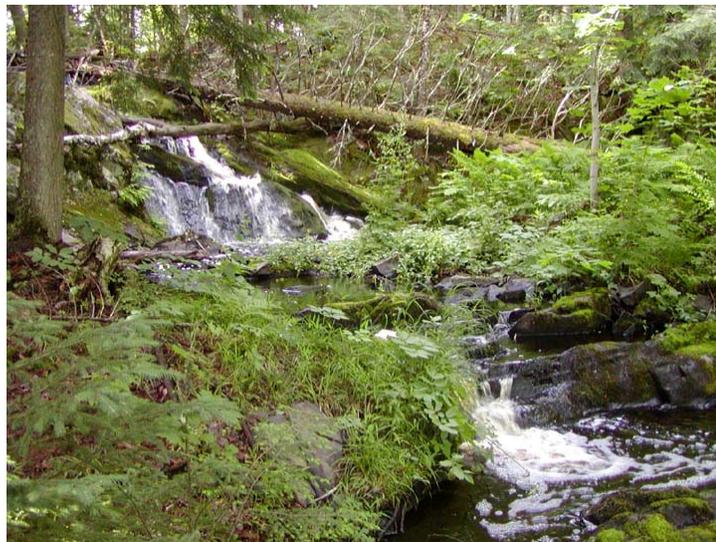


Photo by Rod Sharka, Treasurer and invasive species alert coordinator PIF