

August 31, 2020

Paul Strong  
Supervisor  
Chequamegon-Nicolet National Forest (CNNF)  
Rhineland, WI

Re: Fourmile Creek Vegetation Project

Mr. Strong,

On May 28, 2020, Ron Eckstein spoke to you regarding the Fourmile Creek Vegetation Project. Ron has now reviewed this project on behalf of Wisconsin's Green Fire. Ron is familiar with the Fourmile Creek Project area having spent his career with DNR working in Forest, Vilas, and Oneida Counties and assisting with the American marten reintroduction and monitoring work.

Ron has reviewed all the Fourmile Creek documents and based on his review we believe the Forest Service's management plans did follow the Forest Plan. Part of the review was looking stand by stand at all the forest management prescriptions for the approximately 11,600 acres identified for management in the Fourmile Creek Project.

Ron looked at the proposed management prescriptions for approximately 540 individual stands and found questions and concerns for 74 stands (1,590 acres). The 74 stands consisted of white pine, red pine, eastern hemlock, northern hardwood-hemlock, and mixed upland stands with a year of origin earlier than 1917. Of these 74 stands there are 24 stands with year of origin earlier than 1900 and one stand dating to 1860.

Ron had phone conversations with District Silviculturalist Katie Theisen and Forest Ecologist Linda Parker as well as retired Forest Wildlife Biologist Tony Rinaldi. Many questions were addressed in these conversations. In addition, Ron reviewed the one-page prospectus for 29 Good Neighbor Authority timber sales for the last three years and found that these sales did address our wildlife habitat and biodiversity concerns.

Based on this review, WGF recommends a few changes to some management prescriptions.

### **Recommendations for all stands in the Fourmile Creek Project**

- Apply CNNF standards and guides for wildlife habitat and biodiversity to the fullest extent possible. The project area is within the range of the state-endangered American marten so application of guideline G203 is appropriate.
- G203. Within areas determined to be occupied by American marten do the following: Incorporate Management Area 2B Reserve Tree Guidelines relative to tree numbers and diameters to even and uneven-age managed stands, where existing tree diameters allow.

### **Recommendations for stands with a year of origin earlier than 1917 (1,590 acres)**

- Have the District Silviculturalist, in consultation with the District Wildlife Biologist and Forest Ecologist, field inspect these older stands. Manage these stands with prescriptions that enhance old growth characteristics.
- Consider not managing (reserving as wildlife habitat/biodiversity) the scattered stands of white pine, red pine, and eastern hemlock that are less than 10 acres in size.
- Determine if canopy gaps in relatively pure, small eastern hemlock stands will meet management objectives. Currently, there is no reliable method of regenerating eastern hemlock.
- In northern hardwood-hemlock stands and mixed upland stands with a “thin” or “selection with canopy gaps” prescription: reserve most eastern hemlock, yellow birch, white spruce, and white pine while managing the maple-basswood component with the CNNF’s standards and guides for wildlife habitat and biodiversity.

In addition to the overall direction in G203, our recommendations for the 1,590 acres of pre-1917 stands address the following elements in the Forest Plan Direction: G22, G26, G33, G51, G61, G120, G121, G122, G123, G389, G391, G393, G396, G418, and G421. Summary of Forest Plan Direction: [https://www.fs.usda.gov/nfs/11558/www/nepa/107041\\_FSPLT3\\_3994615.pdf](https://www.fs.usda.gov/nfs/11558/www/nepa/107041_FSPLT3_3994615.pdf)

Much of the project area is a recovering second growth forest. The small scattered pre-1917 stands act as reservoirs of biological diversity including many species of plants and animals. A great benefit of the Forest Plan is it allows for adaptive management to address elements of forest composition and structure as biologists, ecologists, and silviculturalists field check individual stands.



Thank you for this opportunity to comment on the Fourmile Creek Project. We can meet with you and/or District Staff to discuss the information that we developed.

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