GREAT LAKES INDIAN FISH & WILDLIFE COMMISSION
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• MEMBER TRIBES •

MICHIGAN	WISCONSIN		MINNESOTA
Bay Mills Community	Bad River Band	Red Cliff Band	Fond du Lac Band
Keweenaw Bay Community	Lac Courte Oreilles Band	St. Croix Chippewa	Mille Lacs Band
Lac Vieux Desert Band	Lac du Flambeau Band	Sokaogon Chippewa	

November 26, 2025

Submitted via email.
Director of Ecosystem Management Coordination
Attn: Acting Director Brad Kinder
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

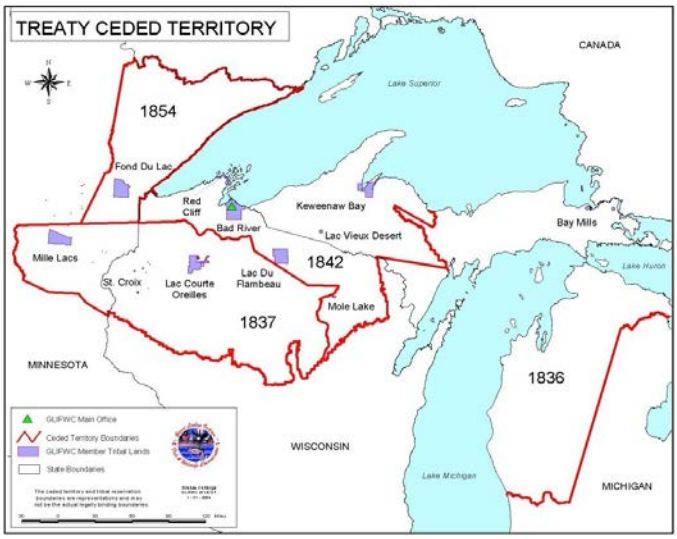
Re: Comment Submitted for Consideration in Environmental Impact Statement (EIS) and Rulemaking Proposing to Rescind the Forest Service's 2001 Roadless Conservation Rule.

Boozhoo Acting Director Kinder,

Staff of the Great Lakes Indian Fish and Wildlife Commission (GLIFWC) submit this letter in response to the Notice of Intent to rescind the 2001 Roadless Area Conservation Rule (Proposed Rescission). Staff appreciate the Forest Service's stated goals to improve local management, reduce wildfire risk, and support rural economies and the Administration's commitment to upholding tribal treaty obligations and trust responsibilities.[1] These comments have been developed by GLIFWC's biological services and policy staff and pertain to the signatory forests to the Forest Service – Tribal Memorandum of Understanding (MOU) in the upper Great Lakes region.[2] These comments express a profound concern among our member Tribes with the proposed rescission and outline specific recommendations to ensure any proposed rule honors tribal trust and treaty obligations within the Ojibwe member Tribes' ceded territories. Please note that this letter does not preclude member tribes submitting additional viewpoints on the proposal in their own sovereign capacities.

As long-time inhabitants of the Great Lakes Region, the Ojibwe (also known as the Anishinaabeg or Chippewa) utilize forests and waterways to facilitate their lifeways. The Ojibwe share the region with the forest and water aya'aag (beings)[3] that provide for the continuation of

[1] USDA SM 1078-010; Tribal Values and Engagement "All federal agencies are obligated to respect tribal sovereignty and self-governance, consult with tribes on policy matters, and fulfill federal trust and treaty responsibilities to tribes to protect tribal treaty rights, lands, assets, and resources" (Retrieved Nov. 5, 2025 from https://research.fs.usda.gov/environment/tribal).
[2] MOU Signatory Forests include in Wisconsin – Chequamegon-Nicolet National Forest; and in Michigan – Ottawa National Forest, Hiawatha National Forest, and the Huron-Manistee National Forest.
[3] For the purposes of this letter, the words "being" or "beings" or "relative" serve as a more consistent word in the English language than contemporary alternatives such as *plant, animal, water,* or *spirit*. Anishinaabeg worldview



these lifeways. GLIFWC is an intertribal natural resource agency exercising delegated authority from 11 federally recognized Ojibwe Tribes in Michigan, Minnesota, and Wisconsin.[4] These Tribes have retained reserved hunting, fishing, and gathering rights on lands and waters in territories ceded to the United States through a number of treaties in the mid-1800s.[5] These treaty-reserved rights have been upheld in a series of federal court cases, including by the US Supreme Court.[6] To effectuate the exercise of these rights, the beings that are used by the tribes as well as their associated habitats and ecosystems, must be restored, conserved, and protected. As these rights pertain to use of and gathering on National Forest lands within treaty ceded territories, they are recognized and regulated through a long-standing *Memorandum of Understanding Regarding Tribal - USDA-Forest Service Relations on National Forest Lands Within the Territories Ceded in Treaties of 1836, 1837, and 1842* (MOU). This MOU articulates the Forest Service's recognition of retained tribal treaty rights, tribal sovereignty, and tribal capacity to self-regulate. Signatories to the MOU are all 11 GLIFWC member Tribes, the USDA Forest Service Eastern Region 9, the Chequamegon-Nicolet National Forest, Ottawa National Forest, Hiawatha National Forest, Huron-Manistee National Forest, the Northern Research Station, and Forest Service law enforcement.

Characterizing the proposed rescission of the roadless rule as a "deregulatory action" where Tribal consultation is not necessary pursuant to EO 13175 would be an error. Unlike other deregulatory efforts, the repeal of the 2001 Roadless Rule would alter ceded territories' forest management, creating new, significant, and direct threats to treaty-reserved resources, cultural landscapes, and the clean water that sustains the Tribes' lifeways. Unlike other deregulatory efforts, the repeal of the 2001 Roadless Rule would alter ceded territories' forest management, creating new, significant, and direct threats to treaty-reserved resources, cultural landscapes, and

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and understanding places our more-than-human aya'aag (beings) or indinawemaaganag (relatives), alongside or above humans because of their cultural, nutritional, and spiritual importance.

[4] GLIFWC member Tribes are; in Minnesota – Fond du Lac Band of Lake Superior Chippewa and the Mille Lacs Band of Ojibwe; in Wisconsin – the Bad River Band of the Lake Superior Tribe of Chippewa Indians, Lac du Flambeau Band of Lake Superior Chippewa Indians, Lac Courte Oreilles Band of Lake Superior Chippewa; Red Cliff Band of Lake Superior Chippewa Indians, Sokaogan Chippewa Community of the Mole Lake Band, and the St. Croix Chippewa Indians of Wisconsin; in Michigan the Lac Vieux Desert Band of Lake Superior Chippewa Indians, Keweenaw Bay Indian Community, and Bay Mills Indian Community

[5] Treaty of 1836, Treaty of 1837, Treaty of 1842, Treaty of 1854.

[6] *Minnesota v. Mille Lacs Band of Chippewa Indians*, 526 U.S. 172 (1999).

the clean water that sustains the Tribes' lifeways. It is not a relief of burden; it is the removal of a critical safeguard for Tribal assets, and full government-to-government consultation is required throughout the rulemaking and implementation processes.

Management Under Existing Rule. The 2001 Roadless Conservation Rule was adopted to establish limitations on road construction, road reconstruction, and timber harvesting in Inventoried Roadless Areas (IRAs), and was intended to provide lasting protection for IRAs within the National Forest System. The rule was justified because these activities have the "greatest likelihood of altering and fragmenting landscapes, resulting in immediate, long-term loss of roadless area values and characteristics."[7] The Rule addressed the existing backlog of approximately $8.4 billion in deferred maintenance and reconstruction (in 2001) over 386,000 miles of roads already in the Forest Transportation System. This is twice as many miles as the entire US Interstate Highway System. As the USFS states in its 2001 Final Rule and Record of Decision (Federal Register 2001), "The size of the existing forest road system and attendant budget constraints prevent the agency from managing its road system to the safety and environmental standards to which it was built." If anything, funding cuts have left the USFS even less able to manage its road system today.

It is important to emphasize that the 2001 rule was not an absolute prohibition on all forest management. The existing roadless rule framework provides for road construction, reconstruction, and timber management for stewardship purposes. The rule provides specific provisions for limited cutting, selling, or removing of timber if the action serves to improve habitat for endangered, threatened, proposed, or sensitive species or restore ecosystem structure and function, such as reducing the likelihood of uncharacteristic wildfire. In many of the roadless areas in the ceded territories, rescinding the 2001 rule would revert forests to their underlying forest management structures that do not provide the same level of management direction and, in certain instances, a significantly different management regime. These roadless areas are a valuable and rare management type in the upper Great Lakes region's national forests.

EIS alternatives should recognize and support tribal conservation priorities and the cultural values of roadless areas. Roadless areas in the ceded territories make up a small but vital portion of the Great Lakes region's national forests. They support mature forest ecosystems that are rare in the surrounding human-dominated landscape. IRAs in the MOU signatory forests and the Superior National Forest total approximately 196,000 acres. IRAs account for only about 1% (16,000 acres) of the National Forest System Lands in Michigan (Huron-Manistee, Hiawatha, and Ottawa National Forests), and approximately 8% (118,000 acres) in the Chequamegon-Nicolet National Forest in Wisconsin, making them a scarce resource in this region compared to western national forests.

[7] 2001 EIS. 66 Fed. Reg. 3244 (Jan. 12, 2001)

The Great Lakes Indian Fish & Wildlife Commission (GLIFWC) member Tribes have expressed concern regarding the proposed rescission of the Forest Service Roadless Conservation Rule and its potential impact on treaty resources. These roadless areas contain unique ecological, cultural, and spiritual values that are deeply significant to Tribal communities. Many of these lands fall within ceded territories where member Tribes' exercise reserved rights to hunt, fish, and gather. Protecting the integrity of these landscapes is vital to sustaining both ecological and cultural resources.

According to tribal cultural teachings, many of the ceded territories' roadless conservation areas provide "dark places, gete-mitigokaag gaamazhii'igaadesinok," or places that haven't been recently cut, providing safety and security comparable to Ojibwe kinships and relationships with elders. These dark places do not conjure up fear or anxiety but provide comfort, power and a place to cast away grief. These areas are vital anchor points for ceremony, traditional practices, and the intergenerational transfer of knowledge, which uphold the essential kinship relationship between the Ojibwe people and their more-than-human relatives. Maintaining this sacred continuity is a core component of Tribal well-being and is directly threatened by habitat fragmentation and increased development.

Several designated roadless areas possess old-growth characteristics, and all provide critical habitat for wildlife, and maintain high water quality, and support important ecosystem function. These lands contribute to the overall health and diversity of forested landscapes across the region. Maintaining a balance of actively managed lands and roadless, unharvested areas is essential for forest resilience, particularly in the face of accelerating climate change and the spread of non-local beings (invasive species).[8]

GLIFWC staff are concerned that the proposed rescission makes these areas vulnerable to new management regimes that threaten these culturally important "dark places." Therefore, staff recommend that the EIS process includes a rigorous analysis of the impacts of rescission on these irreplaceable cultural landscapes and formally incorporate 'cultural integrity' and 'spiritual refuge' as valued ecosystem services to be protected.

The EIS process and documentation should provide flexible protection of ecosystem services and clean water. GLIFWC supports a landscape approach that recognizes the value of both harvested and unharvested forests. Protecting roadless areas not only preserves biodiversity and the characteristics of old-growth forests, but it also upholds Tribal cultural practices and treaty rights. Maintaining this diversity of forest conditions will strengthen the long-term health, resilience, and sustainability of shared forest ecosystems. Lands managed for timber production play an important role in supporting local economies and forest management objectives.

[8] Non-local beings is generally seen as a more respectful term, however, these beings are sometimes referred to as invasive species in this letter for clarity and to reflect legal significance.

However, unharvested and roadless lands are critical in providing ecological balance and refuge for interior forest species increasingly stressed by climate change.

If a primary goal of rescinding the Roadless Rule is to increase timber harvest, such action appears misguided and economically flawed. In the Great Lakes region, approximately 25% of Forest Service timber sales already receive no bids, indicating that market demand and poor economic viability, not timber availability, are limiting production. Given this market reality, opening ecologically and culturally sensitive roadless areas to logging is an unnecessary and destructive solution to a non-existent problem. Expanding harvest into roadless areas in the Great Lakes region would undermine ecological diversity and cultural values without addressing the underlying challenges in forest product markets or management capacity.

These ecosystem services are not theoretical. Roadless areas in the ceded territories function as critical headwaters to the Mississippi River Basin and the Great Lakes. They provide filtration systems for groundwater recharge as well as for the rivers and sloughs that sustain tribal lifeways. The stated objectives of the proposed rescission include the construction of new roads and increased timber harvest of IRAs; these activities are known to cause direct and immediate harm to water quality through increased sedimentation, thermal pollution resulting from the loss of riparian canopy, and altered hydrology. Ecosystem services provided by roadless areas provide an important balance that protect especially sensitive ecosystems.

Negative impacts brought on by a foreseeable imbalance in forest management caused by the proposed rescission may threaten the viability and quality of treaty-reserved resources. Increased sedimentation can smother the spawning beds of ogaa (walleye) and name (lake sturgeon). Warmer water temperatures eliminate critical habitat for cold-water species such as ogaa and maazhomegos (brook trout). Furthermore, altered water levels and increased sediment loads can harm manoomin (wild rice) beds, which are already an imperiled ecosystem. Therefore, the USFS must go beyond a simple inventory and provide for rigorous, watershed-scale, reasonably foreseeable environmental trends and planned actions through its analysis of how new road networks and timber harvesting activities would impact water temperature, sediment loads, and hydrology for culturally vital beings such as those identified above.[9] GLIFWC staff recommend that Forest Service provide a detailed analysis through its EIS of the impacts the proposed rule will have on ecosystem services, landscape connectivity, and clean water in relation to tribal lands, local water quality, and water supplies.

Any rule revision should include a greater focus on tribal conservation priorities and beings of tribal interest. As discussed above, an MOU between GLIFWC member tribes and the USFS has been in place for over 25 years. Further, EO 14225, Immediate Expansion of

[9] *See attached,* Appendix One. Table 1. Beings (see footnote 3) likely to have habitat within and/or affected by the inventoried roadless area(s) in the Superior, Chequamegon-Nicolet, Ottawa, Hiawatha, and Huron-Manistee national forests.

American Timber Production and SM 1078-006 directs the USFS to enter into agreements with Tribes to facilitate increased timber production and cooperative forest management, such as the Good Neighbor Authority,[10] and agreements or contracts with Indian Tribes under the Tribal Forest Protection Act (TFPA).[11]

Therefore, we recommend that the EIS include a non-rescission alternative that explicitly retains IRAs and provides for and incentivizes cooperative agreements between the Forest Service and Tribes for their management. The proposed alternative should include a directive for Forests to enter into cooperative agreements for the management of IRAs with Tribes. The EIS process should further provide explicit direction for National Forest units to manage IRAs in a manner that considers Tribally important characteristics of IRAs, integrates Anishinaabe gikendasowin (Indigenous Knowledge) as a source of best available science, and prioritizes the conservation of tribally important beings and conditions. GLIFWC staff look forward to working with the Forest Service and tribal staff to ensure the EIS honors Tribal conservation priorities and does not restrict Tribes' treaty-reserved rights.

Impacts to Tribal and Federal threatened/endangered species (T&E) and regional forester sensitive species (RFSS) should be addressed during the EIS process.[12] The rescission would subject IRAs in the ceded territories to new or increased active forest management that could significantly impact threatened, endangered, and sensitive species habitat through road construction, reconstruction, or increased logging activity. The existing 2001 Roadless Conservation Rule includes provisions for timber management specifically to "improve habitat for endangered, threatened, proposed, or sensitive species." Threats to these beings are even more significant today than when the 2001 EIS was written, especially in the light of new disease, wildfire, and climate change-related threats. Since 2001, additional species have been federally listed due to catastrophic declines, making these IRA refugia even more critical to their survival.

The Northern Long-Eared Bat (*Myotis septentrionalis*), now Federally Endangered, relies on mature forest trees, snags and canopy for roosting and maternity colonies. Those forest features would be reduced by logging of IRAs. Federally Threatened species like the Gray Wolf (*Canis lupus*) and Canada Lynx (*Lynx canadensis*) depend on the large, unfragmented forest tracts that IRAs uniquely provide. For example, construction of new roads and logging would fragment habitat for the Chequamegon-Nicolet National Forest (CNNF) RFSS and Tribally and State Endangered American Marten (*Martes americana*) and destroy the shaded, mature understory preferred by American Ginseng (*Panax quinquefolius*) and other plants entirely dependent on the 'dark places' (gete-mitigokaag) found in roadless areas.

[10] 16 U.S.C. 2113a
[11] 25 U.S.C. 3115a
[12] *Id.*

GLIFWC staff have reviewed the proposal and identified Federal and Tribal Threatened and Endangered Species, Federal Threatened and Endangered Species, and RFSS that are likely to have habitat within the IRA(s) in member Tribes' ceded territory forests; this list is included as Table 1 in Appendix 1 to this letter. Further, Appendix C of the 2001 Final EIS.[13] for the existing rule notes that many of these species have designated critical habitat within and/or are affected by IRA(s) in USFS Eastern Region-9. The Forest Service should analyze in its EIS, how the proposed rescission would impact these beings. The EIS should also propose a non-rescission alternative that keeps intact a management direction to protect and support habitat of these beings, such as the *Martes americana,* in the existing ceded territories' IRAs.

Proposed rescission would exacerbate invasive species problems and lead to increased fire frequency. The proposal to end the Roadless Rule outlined in the 2025 Federal Register implies that IRAs somehow increase the likelihood and destructiveness of insect and disease infestations and extreme wildfire threats. However, the overwhelming scientific body of evidence suggests the opposite is true as it pertains to the Great Lakes region. The most destructive invasive species in the Great Lakes region, like emerald ash borer, Asian longhorned beetle, spongy moth (formerly gypsy moth), spotted lanternfly, and the scale insect that carries beech bark disease, first became established in human-dominated areas. From there these invasive species made their way into natural forests, on their own and with the inadvertent help of humans. [14] [15]

[13] *Final Environmental Impact Statement Volume 1: Forest Service Roadless Area Conservation*. USDA. November 2000. Retrieved via on 11/24/2025: https://www.fs.usda.gov/sites/default/files/roadless/roadless-feis-volume1.pdf

[14] Bray, A. M., L. S. Bauer, T. M. Poland, R. A. Haack, A. I. Cognato, and J. J. Smith. 2011. Genetic analysis of emerald ash borer (*Agrilus planipennis* Fairmaire) populations in Asia and North America. Biological Invasions 13(12): 2869-2887. https://doi.org/10.1007/s10530-011-9970-5 . Access at https://www.nrs.fs.usda.gov/pubs/jrnl/2011/nrs_2011_bray_001.pdf .

[15] Berland, A. and G. P. Elliott. 2014. Unexpected connections between residential urban forest diversity and vulnerability to two invasive beetles. Landscape Ecology 29: 141–152. https://doi.org/10.1007/s10980-013-9953-2 . Access at https://www.researchgate.net/publication/258164258_Unexpected_connections_between_residential_urban_forest_diversity_and_vulnerability_to_two_invasive_beetles#fullTextFileContent .

Road and power corridors are well-known for their role in facilitating the spread of non-native, invasive plant species to new areas.[16] [17] [18] [19] [20] Seeds, rhizomes and other propagules are easily introduced with mud on vehicles and equipment, and the relative lack of competition for light and other resources provides an opportunity for invasive plants to get a foothold.[21] The data is clear that more roads mean more non-local beings (invasive species) and their undesired impacts.

Most wildfires are initiated by human activity. One study found that most ignitions occur within 50 m (164 ft) of a road.[22] Additional studies have found that over 88% of all wildfires nationwide are caused by humans.[23] [24] Much of the upper Great Lakes region's forests consist of mixed northern hardwood and hardwood-conifer forest dominated by sugar maple. These forests are highly fire-resistant and on average only burn on the order of once every several hundred to several thousand years.[25] Furthermore, roadless areas are generally located in remote areas with little or no human habitation, so the fires that occur there are typically not threats to rural communities. It is far more efficient and effective to concentrate fire control and prevention

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[16] Hansen, M. J. and A. P. Clevenger. 2005. The influence of disturbance and habitat on the presence of non-native plant species along transport corridors. Biological Conservation 125 (2): 249-259. https://doi.org/10.1016/j.biocon.2005.03.024.

[17] Flory, S. L. and K. Clay. 2006. Invasive shrub distribution varies with distance to roads and stand age in eastern deciduous forests in Indiana, USA. Plant Ecology 184(1): 131-141. https://doi.org/10.1007/s11258-005-9057-4. Access at https://www.researchgate.net/publication/225438417_Invasive_shrub_distribution_varies_with_distance_to_roads_and_stand_age_in_eastern_deciduous_forests_in_Indiana_USA#fullTextFileContent.

[18] Buckley, D. S, T. R. Crow, E. Nauertz and K. E. Schulz. 2003. Influence of skid trails and haul roads on understory plant richness and composition in managed forest landscapes in upper Michigan, USA. Forest Ecology and Management 175 (1-3): 509-520. https://www.doi.org/10.1007/s10980-013-9953-2. Access at https://www.nrs.fs.usda.gov/pubs/jrnl/2003/nc_2003_buckley_001.pdf .

[19] Fan, Z., K. Moser. M. H. Hansen, and M. Nelson. 2013. Regional patterns of major nonnative invasive plants and associated factors in upper Midwest forests. Forest Science 59(1):38-49. https://doi.org/10.5849/forsci.10-100. Access at https://www.fs.usda.gov/rm/pubs_journals/2015/rmrs_2015_fan_z001.pdf .

[20] Mortensen, D. A., E. S. J. Rauschert, A. N. Nord, and B. P. Jones. 2017. Forest roads facilitate the spread of invasive plants. Invasive Plant Science and Management 2(3): 191-199. https://doi.org/10.1614/IPSM-08-125.1. Accessed at https://www.researchgate.net/publication/240773465_Forest_Roads_Facilitate_the_Spread_of_Invasive_Plants#fullTextFileContent.

[21] Coffin, A. W. 2007. From roadkill to road ecology: a review of the ecological effects of roads. Journal of Transport Geography 15(5): 396-406. https://doi.org/10.1016/j.jtrangeo.2006.11.006. (Accessed at https://www.researchgate.net/publication/222688089_From_roadkill_to_road_ecology_A_review_of_the_ecological_effects_of_roads#fullTextFileContent).

[22] Aplet, Gregory H., Hartger, Phil, and Dietz, Matthew S. Three-decade record of contiguous-U.S. national forest wildfires indicates increased density of ignitions near roads. Fire Ecology (in review). Summary at https://www.wilderness.org/sites/default/files/media/file/Summary%20NFS%20roads%20fire%20paper%20-%202025.pdf.

[24] Morrison, Peter H. May 2007. Roads and Wildfires. Pacific Biodiversity Institute, Winthrop, WA. https://www.pacificbio.org/publications/wildfire_studies/Roads_And_Wildfires_2007.pdf

[25] U.S. Department of Agriculture, Forest Service, Missoula Fire Sciences Laboratory. 2012. Information from LANDFIRE on fire regimes of northern mixed-hardwood communities. In: Fire Effects Information System, U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Missoula Fire Sciences Laboratory. https://www.fs.usda.gov/database/feis/fire_regimes/Northern_mixed_hardwoods/all.html .

efforts along the wildland - urban interface. Home-hardening measures such as using fire-resistant materials and clearing dry vegetation from around buildings can go a long way towards protecting people and their homes. Opening new corridors for the spread of invasive species, many of which are more flammable than mature hardwood forests is counterproductive.[26][27]

Throughout the EIS processes, it is essential that the USFS provide robust analysis for impacts to tribally important, RFSS, and Tribal and Federal Threatened/Endangered Species and develop solutions that ensure protection for these beings from threats such as climate change, invasive species, and extreme human-caused wildfire. The existing roadless conservation rule provides for management direction to improve and protect habitat for these beings and this management direction should be maintained. For example, the USFS should provide guidance to local Forests for consultation and coordination with Tribes to develop Forest Plan protections in situations when, in the absence of existing roadless conservation rule directions, there would be no equivalent protection.

In conclusion, the current roadless rule, as applied to the four Forests that are party to the Tribal-Forest MOU, is a valuable means to protect critical ecosystems and beings that are important to tribal members. It should not be repealed. However, should the Forest Service continue to move forward with the proposed rescission, it must work closely with tribes and comply with the mandates and processes provided in the MOU. Only in this way can the Forest Service ensure that treaty resources potentially impacted by this proposed rulemaking remain protected and abundant for the next seven generations.

Sincerely,

Jason Schlender
Manidoo Noodin
Executive Administrator

Attached: Appendix 1.

[26] Westover, R. H. April 2021. Make your home wildfire defensible. Homeowners can take preventative steps long before wildfires begin. US Forest Service website. https://www.fs.usda.gov/about-agency/features/make-your-home-wildfire-defensible .

[27] Dale, L., K Barrett, and A. Reister. June 2023. Missing the mark: Effectiveness and funding in community wildfire risk reduction. Published by Headwaters Economics, Bozeman, MT and Columbia University, New York, NY. 36 pages. https://headwaterseconomics.org/wp-content/uploads/HE_2023_Missing-the-Mark-Wildfire.pdf .

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APPENDIX ONE

Table 1. Beings likely to have habitat within and/or affected by the inventoried roadless area(s) in the Superior, Chequamegon-Nicolet, Ottawa, Hiawatha, and Huron-Manistee national forests.

Scientific Name	**Common Name**	**Species Group**	**Tribal Status ('37 & '42 CT)[1]**	**Federal Status**	**RFSS on CT Forest**	**Justification, Key Dependencies & Relevant Forests**
Birds						
Accipiter artricapillus	American Goshawk	Bird			Yes	Nesting in mature, extensive forests. Wisconsin state special concern (SC) species. (All CT forests)
Aegolius funereus	Boreal Owl	Bird	E		Yes	Dependent on boreal forest habitat. (Chequamegon-Nicolet, Hiawatha, Superior)
Asio otus	Long-eared Owl	Bird			Yes	(Hiawatha, Huron-Manistee). Wisconsin state SC species.
Charadrius melodus	Piping Plover	Bird	E	E		2001 EIS (R9). Documented population occurrence within and near Ceded Territory roadless area.
Coturnicops noveboracensis	Yellow Rail	Bird	E			Open marshes and wet meadows. (Chequamegon-Nicolet, Hiawatha)
Haliaeetus leucocephalus	Bald Eagle	Bird			Yes	2001 EIS (R9). (Huron-Manistee)

[1] As implementing tribal treaty right exercise in the Wisconsin Ojibwe Ceded Territory pursuant to the *Lac Courte Oreilles Band of Lake Superior Chippewa Indians v. Wisconsin (Voigt Decision)* line of cases, Stipulations, Voigt Intertribal Task Force Protocols, and the Chippewa Intertribal Comanagement Agreement.

Picoides arcticus	Black-backed Woodpecker	Bird			Yes	Dependent on spruce/fir and burned forests. (Chequamegon-Nicolet, Hiawatha, Ottawa, Superior)
Fish						
Acipenser fulvescens	Lake Sturgeon	Fish			Yes	All five CT forests. Exceptionally significant cultural significance.
Coregonus zenithicus	Shortjaw Cisco	Fish			Yes	Cold, deep lake waters. (Superior NF)
Lota iota	Burbot	Fish			Yes	Dark waters. (Superior NF)
Scaphirhynchus albus	Pallid Sturgeon	Fish	E	E		2001 EIS. (R9)
Invertebrates						
Bombus affinis	Rusty Patched Bumble Bee	Invertebrate	E	E		A generalist that utilizes a variety of habitats, including forested wetland edges and prairie fens, for nesting and foraging. (Chequamegon-Nicolet, Huron-Manistee)
Cyprogenia stegaria	Fanshell	Invertebrate	E	E		2001 EIS (R9)
Epioblasma torulosa rangiana	Northern Riffleshell	Invertebrate	E	E		2001 EIS (R9)
Lampsilis abrupta	Pink Mucket Pearlymussel	Invertebrate	E	E		2001 EIS (R9)
Pieris virginiensis	West Virginia White	Insect			Yes	Moist, mature deciduous forest (All five forests). An RFSS for Chequamegon-Nicolet and Ottawa.
Mammals						
Alces alces	Moose	Mammal			Yes	
Canis lupus	Gray Wolf	Mammal	E	E		2001 EIS (R9)

Eptesicus fuscus	Big Brown Bat	Mammal	T		Yes	Roosting sites, foraging areas, and travel corridors in deciduous forest ecosystems. (Huron-Manistee)
Lepus americanus	Snowshoe Hare	Mammal			Yes	(Huron-Manistee). Wisconsin state SC species.
Lynx canadensis	Canada Lynx	Mammal	E	T		2001 EIS (R9), Dependent on boreal/northern conifer forests with dense understories, primarily preying on Snowshoe Hare. (Superior, Hiawatha)
Martes americana	American Marten	Mammal	E		Yes	
Myotis grisescens	Gray Bat	Mammal	E	E		2001 EIS (R9)
Myotis septentrionalis	Northern Long-Eared Bat	Mammal	E	E		Roosts in snags and live trees in forested areas during summer; hibernates in mines and caves. (All CT forests)
Myotis sodalis	Indiana Bat	Mammal	E	E		2001 EIS (R9)
Puma concolor cougar	Eastern Cougar	Mammal	E	E		2001 EIS (R9)
Plants						
Cirsium pitcheri	Pitcher's Thistle	Plant	T	T	No	2001 EIS (R9), Endemic to sand beaches and dunes of Lakes Michigan, Huron, and a few sites on Lake Superior.
Cypripedium parviflorum var. makasin	Northern Yellow Lady-slipper	Plant			Yes	Moist coniferous, mixed, and deciduous forests, fens, meadows, borders of forests and clearings, often under cedar, and mostly in clearly calcareous soils. (Ottawa)
Cypripedium parviflorum var. pubescens	Greater Yellow Lady-slipper	Plant				Moist coniferous, mixed, and deciduous forests, fens, meadows, borders of forests and clearings, often under cedar, and mostly in clearly calcareous soils. (Ottawa)
Cypripedium reginae	Showy lady-slipper	Plant			Yes	Fens and coniferous swamps, often with tamarack and cedar, less often with spruce and fir; thriving in open glades, clearings, old roads

						through peaty ground, etc.; occasionally in other swampy situations and along calcareous ridges and dunes, with conifers. (Ottawa)
Geum macrophyllum	Large-leaved avens	Plant				State of Wisconsin SC species.
Hymenoxys herbacea	Lakeside Daisy	Plant	T	T		2001 EIS (R9)
Juglans cinerea	Butternut	Plant			Yes	Stream banks and swamps, upland beech-maple, oak-hickory, and mixed hardwood stands. (Chequamegon-Nicolet, Hiawatha, Huron-Manistee, Ottawa)
Oxytropis campestris var. chartacea	Fassett's Locoweed	Plant	E	T		2001 EIS (R9) Sandy lakeshores, often of seepage lakes. Endemic to Wisconsin. Occurs in the (Chequamegon-Nicolet National Forest). There are documented populations known to occur adjacent to and foreseeably within roadless area(s) on the Chequamegon-Nicolet.
Panax quinquefolius	American Ginseng	Plant	CITES	CITES	Yes	Deciduous and mixed hardwood forests that have had time to mature naturally. (Chequamegon, Huron-Manistee, Ottawa)
Solidago houghtonii	Houghton's Goldenrod	Plant	T	T		2001 EIS (R9). (Hiawatha)
Taxus canadensis	Canada Yew	Plant			Yes	Rich, often swampy deciduous, mixed, or coniferous forests. (Huron-Manistee)
Reptiles						
Emydoidea blandingii	Blanding's Turtle	Reptile			Yes	Shallow wetlands, marshes, and ephemeral pools. (Chequamegon-Nicolet, Hiawatha, Huron-Manistee, Ottawa)
Glyptemys insculpta	Wood Turtle	Reptile	T		Yes	Riparian forested upland foraging habitat adjacent to streams/rivers. (All CT forests)