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***Open Lands Management Environmental  
Assessment 30-Day Notice and Comment Summary***

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**Public Concern Number:** 1      **Comment Category:** Alternatives      **Concern Type:** Bottomlands

**Public Concern Statement:**

The Forest Service should manage bottomlands for waterfowl hunting opportunities

**Forest Service Response:**

Beyond scope of action. Open lands in this decision consist of traditional row-crops, hayfields, wildlife plantings, old fields, and ecological restoration areas. See 2004 Area Plan and accompanying FEIS.

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2	5	like to see some moist soil units or flooded standing corn, beans etc in areas near the lakes and bottom land creek areas (that can be hunted). ... There is nothing being done to provide an inland place to waterfowl hunt
3	1	I think that it would be prudent to expand wetland areas in the area. Wetlands serve many purposes in terms of cleaning and filtering water in the environment as well as providing a great deal of variety of flora and fauna. These wetlands will be used for many purposes such as birdwatching, hunting, possibly fishing, and even perhaps as learning areas for classes.

**Public Concern Number:** 2      **Comment Category:** Alternatives      **Concern Type:** Forest / birds

**Public Concern Statement:**

The Forest Service should create larger, contiguous, old growth blocks of forest by allowing some open lands to revert to forest.

**Forest Service Response:**

This alternative was considered and not developed as described in Chapter 2 of the EA. The amount of open lands and forested lands were determined by the 2004 Area Plan and accompanying FEIS. Site specific effects of the proposed action (reduction of croplands by approximately 30%) are disclosed in Chapter 3 of this EA. Allowing all of the open lands to revert to forest was considered in the no action alternative. Alternative 3 reduces cultivated lands by approximately 60% and the effects are disclosed in Chapter 3 of the EA.

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While we are not advocating, and it is unlikely that any kind of management activity that LBL could totally eliminate all managed openlands and associated species, we believe that a simple reduction in their population on LBL due to the reforestation of the area into larger, contiguous, old growth blocks of forest is not any kind of reasonable justification to continue the bulk of this farming and other openland management.

**Public Concern Number:** 3

**Comment Category:** Alternatives

**Concern Type:** Natural openings /  
no chemicals

**Public Concern Statement:**

**Forest Service Response:**

The Forest Service should develop and consider in detail an alternative to eliminate row crops and to decrease the use of pesticides. The Forest Service should consider an alternative to decrease the use of fertilizers.

The Forest Service published two alternatives for notice and comment. A third alternative was developed for detailed consideration as a result of the comments and Interdisciplinary Team discussions. This alternative is labeled Alternative 3 in this EA and eliminates row crops, decreases the use of pesticides, and decreases the amount of fertilizers.

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1	14	... failed to acknowledge the fact that the very disturbances you propagate through your open land management are the main reasons why you have to use pesticides to control noxious species. An alternative of converting fields to native grasses over time, with initial need for herbicides decreasing as natives become established, was not considered. Other integrated practices ... were obviously not considered. Examples include double cropping, micro field management, and biological control (Culliney 2005). ... typical in the FS to request proposals for meeting objectives through special use permits ... would likely surface opportunities (alternatives) to decrease the use of pesticides and/or to grow alternative crops such as native grasses. Native grass seed is very much in demand throughout the U.S.
1	23	Based on the studies referenced above, you should consider the cumulative effects of the use and should also consider alternative(s) which limit the application of fertilizers.
4	15	If the agency wants to reduce the environmental effect of this proposal, they should do away with the farm chemicals, the commercial, row-crop farming, and make sure that natural openings are located outside of forest interior areas.
57	12	LBL should be able to identify and maintain, without chemicals, and with a minimum of burning, some lands which can provide some of the lovely plants and animals which utilize this habitat, while having a minimum impact on the already highly stressed forest interior habitat on LBL.

**Public Concern Number:** 4      **Comment Category:** Alternatives      **Concern Type:** Plantings

**Public Concern Statement:**

**Forest Service Response:**

The Forest Service should manage the open lands in the power and gas line corridors in native vegetation. The plantings in open lands should be rotated every few years.

The management of the utility corridors, including power and gas lines, is determined jointly with the permittees and is outside the scope of this decision. Rotation of open lands vegetation is disclosed in the EA throughout the document.

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2	4	The plots could be rotated every few years. I think companion planting of plants that benefit each other in food plots would be a good idea also.
2	6	The power lines and gas lines could be planted in clover, wheat, plots, etc in certain places to cut down on mowing costs

**Public Concern Number:** 5

**Comment Category:** Effects

**Concern Type:** Air

**Public Concern Statement:**

**Forest Service Response:**

The Forest Service should analyze the air pollution effects of pesticides and prescribed fire because visitors and wildlife are sensitive to chemicals and particulates.

The Forest Service did analyze air effects from pesticides and prescribed fire. The air resource and effects of pesticides are disclosed in Chapter 3 of this EA. Cumulative effects of prescribed fire are disclosed in this EA.

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4	10	how this farming affects LBL recreational users. When these farmers apply chemical pesticides of all types to these fields, the air pollution is severe.... Any user can encounter contaminated air as they use the forest. Children and elderly are particularly sensitive. Some of these chemicals have endocrine disrupting impacts, which can have long term effects on humans, and other wildlife.
4	12	There will be significant particulate pollution coming from burning. ... LBL is talking about using fire at a level way beyond any kind of historical level of natural fire occurrence in LBL. ...cumulative effect of this on particulate pollution in the east?
4	13	And it isn't just LBL that is increasing prescribed fire - it is the Shawnee, Hoosier, Mark Twain, and other national forests and state lands in the eastern U.S. that are significantly increasing burning. Particulate pollution has many significant adverse health effects on humans and other living creatures.

**Public Concern Number:** 6

**Comment Category:** Effects

**Concern Type:** Carbon Storage

**Public Concern Statement:**

**Forest Service Response:**

The Forest Service should consider the cumulative effects of the proposed action on carbon storage.

Beyond scope of action. Analysis of carbon storage and climate stability are national and international in scale.

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The Forest Service needs to consider the impact of its activities on carbon storage and climate stability. Some of this proposal involves burning. This releases large amounts of carbon directly into the atmosphere. ... this activity suppresses the reforestation of the area, which would result both in increased carbon storage and in increase shade. Taking hay off the land will result in reduced carbon storage.... LBL needs to consider the value of the land for carbon storage and the cumulative impact of its activities on this resource.

**Public Concern Number:** 7

**Comment Category:** Effects

**Concern Type:** Economics -  
farming

**Public Concern Statement:**

**Forest Service Response:**

The Forest Service should take into account the cost/benefit analysis of maintaining agricultural fields. The analysis should consider the national agriculture surplus.

Socio-economic effects are disclosed in Chapter 3 of this EA. Effects to wildlife and recreation of maintaining the open lands are disclosed in Chapter 3 of the EA. An agriculture surplus is outside the scope of this project.

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negative effects of maintaining agricultural fields on LBL are worth it and what would be the cost to demand species and/or hunting of not doing so.

4	9	farming competes unfairly with private farmers, and that the cost/benefit analysis doesn't take into account a number of important costs. We want to know how much LBL receives in total for all of the farming, and how much it costs LBL overall to implement the program. We want to know exactly how LBL values clean water, forest habitat, recreational value, clean air, and scenic beauty compared to the income from the farms.
97	2	it is ironic for our public lands... to be given to agricultural purposes while at the same time tax subsidies go to other farmers to pull productive land out of production because of agriculture surplus. LBL farming only benefits a few farmers while contributing to an overall national surplus

**Public Concern Number:** 8      **Comment Category:** Effects      **Concern Type:** Environmental

**Public Concern Statement:**

**Forest Service Response:**

The Forest Service should recognize the environmental effects of the open lands management activities on LBL because farming is detrimental to the environment and are inconsistent with federal laws.

This environmental assessment discloses the effects of alternative forms of open lands management on LBL. The Forest Service is in compliance with applicable environmental laws.

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4	1	farming and associated openlands management activities on LBL are misguided, environmentally damaging, do not provide a long term economic benefit, compete with private interests, and are inconsistent with federal laws protecting the environment.
4	3	row crop farming in a forest interior area using toxic farm chemicals can have a multitude of adverse impacts, ranging from water pollution to forest fragmentation to exposure of wildlife to the chemicals to degradation of the long term productivity of the soil.

**Public Concern Number:** 9

**Comment Category:** Effects

**Concern Type:** Forest - cover

**Public Concern Statement:**

**Forest Service Response:**

The continued maintenance of open lands results in forest fragmentation and causes impacts.

Effects of open lands cover types were addressed in the 2004 Area Plan and accompanying FEIS. Site specific effects of the proposed action and alternatives amounts of vegetative cover types are disclosed in Chapter 3 of this EA.

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4	6	Miles cowbird study identified, LBL is already highly fragmented.
4	16	Though once almost completely covered by forest, it is now sliced and diced by these farm fields, roads, highways, hay fields, old logging sites, ROWs and managed openlands. The impacts of this are significant on the ecology. LBL needs to be putting the forest back together
57	1	We have yet to see a map of LBL which identifies where the most contiguous blocks of forest are in LBL, and how the farming and other openland management have and will impact those larger forested blocks. We have yet to see where the forested corridors are connecting large blocks of forest, and how the farming and other openland management will impact those corridors.

**Public Concern Number:** 10

**Comment Category:** Effects

**Concern Type:** Heritage

**Public Concern Statement:**

The proposed action will have an adverse impact on historical features and does not comply with National Historical Preservation Act or NEPA. The Forest Service should update the Heritage Resource Management Plan before continuing the management of open lands on LBL.

**Forest Service Response:**

Heritage effects are disclosed in Chapter 3 of the EA. The Forest Service has met the requirements of NHPA as discussed in the heritage specialists report in the project record. Proposed changes to the Heritage Resource Management Plan are outside the scope of this decision.

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4	8	farming both denigrates the history of the former residents...and threatens important historical aspects of how past farming techniques were done. Why is LBL just allowing these areas to be plowed up before having any kind of comprehensive survey done? These projects do not comply with the National Historical Preservation Act, or NEPA.
57	5	Heritage Resource Plan is inadequate and needs to be updated... while continually moving ahead with activities that have an adverse impacts on historical features.

**Public Concern Number:** 11

**Comment Category:** Effects

**Concern Type:** Pesticides

**Public Concern Statement:**

The Forest Service should use research results that show the impacts of the pesticides Atrazine and Roundup on frogs and humans.

**Forest Service Response:**

The pesticide Atrazine has not been applied to open lands at LBL since 2003. The effects of all of the pesticides in this proposed action are disclosed in Chapter 3 and appendix of this EA and in the project record. The effects to sensitive species are disclosed in the BAE. Research for pesticides was considered to determine these effects, as noted in the cited literature.

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1	9	Another example of real life differences in research results involves Atrazine, a widely use herbicide on LBL (DeNoyelles 1982, Thurman 1992)
1	26	Culliney, Thomas W. 2005, Benefits of Classical Biological Control for Managing Invasive Plants, Critical Reviews in Plant Sciences, 24, pp 131-150, DeNoyelles, Frank et al, 1982, The responses of Plankton Communities in Experimental Ponds to Atrazine, the most heavily used pesticide in the United States, Ecology, pp 1283-1293, Michael, Jerry L, Neary, Daniel G, 1990, Fate and Transport of Forestry Herbicides in the South: Research Knowledge and Needs. Paper presented at Sixth Biennial Southern Silvicultural Resource Conference, Memphis TN October 30 – Nov. 1, 1990, Relyea, R. Mills, et al, 2003, Predator-induced stress makes the pesticide carbaryl more deadly to gray tree frog tadpoles (Hyla versicolor), Ecology Applied 13, pp 1515-1521, Thurman, E. Michael, et al, 1992, A Reconnaissance Study of Herbicides and Their Metabolites in Surface Water of Midwestern United States Using Immunmoassay and Gas Chromatography/Mass Sprecrometry, Environmental Science Technology, 28, p2440-2447, Teplitsky, C. et al, 2005, Common Pesticide Increases Cost of Anti-predator Defenses in Rana temporaria Tadpoles, Environmental Science Technology, 39, p 6079-6085
57	6	studies have found Atrazine and Roundup to have serious impacts on the reproductive success of frogs... what is it doing to humans? Allowing this kind of chemical use on a public land is unconscienable in its in its potential impact on forest users, let alone the rest of the ecology.

**Public Concern Number:** 12

**Comment Category:** Effects

**Concern Type:** Pesticides -  
cumulative effects

**Public Concern Statement:**

**Forest Service Response:**

The Forest Service should disclose the cumulative and synergistic effects of the pesticides used at LBL. Results of monitoring should be used to determine effectiveness of pesticide use program.

The effects of the pesticides in this proposed action are disclosed in Chapter 3 and appendix of this EA and in the project record. The effects to sensitive species are disclosed in the BAE. The cumulative effects are accounted for in the EA.  
Field monitoring of pesticide use and effectiveness are conducted by FS program staff and cooperative farmers.

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1	1	One of the flaws in your analysis to date is your failure to disclose the results on your required pesticide use reports from 2000 through 2006. ...give a summary of the current use of pesticides... Without this information, there is no way to complete cumulative effects analysis for past activities
1	2	what are the results of your monitoring of the pesticide use program and of your inspections of the special use permittees, contractors and FS employees? ... it is very important to see how the program has worked ... to assure that 1) you are fulfilling your responsibilities
1	15	You must consider the cumulative effects of all pesticide uses on LBL due to the widespread use of your proposed pesticides. This will include the identification and analysis of all pesticides for the treatment of insect infestations, including biting insects. These pesticides are not restricted to just developed recreation sites on LBL but are also used along hiking and biking trails that wind through the forest. It would be wise to prepare some modeling of the transport and fate of herbicides and fertilizer in LBL watersheds.
1	16	Since many of the pesticides you are proposing to use are used at the same time and location, you should also consider and analyze the cumulative effects of multiple pesticides applied together. The current risk assessments do not analyze for multiple pesticides and possible interactions between them.

**Public Concern Number:** 13

**Comment Category:** Effects

**Concern Type:** Pesticides - risk assessments

**Public Concern Statement:**

**Forest Service Response:**

The Forest Service should use risk assessments intended for use of pesticides on open lands.

The risk assessments of the pesticides in this proposed action are disclosed in Chapter 3 and appendix of this EA and in the project record.

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1	8	Weaknesses in EPA laboratory testing on pesticide toxicity to wildlife species - There is a growing body of evidence that EPA laboratory testing and approval of pesticides is missing an important connection on the potential effects of pesticides in light of natural environmental stressors. (Telplitsky 2005, Relyea 2003)
1	12	You state that risk assessments will be prepared for chemicals included in your proposed action that are not yet covered by FS approved risk assessments. This violates NEPA . Pesticides without approved and appropriate risk assessments or that are not being fully analyzed at this time should be removed from the proposed action
1	13	Approved FS Risk Assessments (Forest Service Human Health and Ecological Risk Assesments) are related to forestry work and are not prepared or intended for use in agricultural. You are proposing to use pesticides suitable for agricultural uses when the FS risk assessments are for forestry use. ... distinction between intensive forest management use of herbicides and agricultural is significant (Michael 1990).
101	8	The SERA risk assessments are not a NEPA process, have not considered the scientific information presented in the attached exhibits, are generally limited to EPA pesticide registration data (which do not examine the effects of pesticides on amphibians), and are focused on pesticides as used in forestry, not farming, applications.
101	11	Hazard quotients are toxicant-specific and a single hazard quotient threshold (e.g., "1" as used in the LBL LRMP) cannot be used to characterize the real aquatic risk to any species from all pesticides. See Volosin, J.S., and R.D. Cardwell, "Significance of aquatic hazard quotients: What is the significance of a hazard quotient >1?" Conf. on Env. Sciences in the 21st Century, Nov. 13, 2000 ("It appears that HQ-risk relationships are toxicant specific, influenced by the quality and character of the data, and should not be generalized

**Public Concern Number:** 14

**Comment Category:** Effects

**Concern Type:** Recreation -  
wildlife viewing

**Public Concern Statement:**

**Forest Service Response:**

The Forest Service should continue managing open lands for visitors to view wildlife that use open land habitat.

The 2004 Area Plan and accompanying FEIS, and the purpose and need for this action, disclose the need for open lands for recreation at LBL. The effects of open land management on wildlife viewing are disclosed in Chapter 3 of the EA.

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87	1	viewing wildlife is a form of recreation that has been identified by forest visitors as being one of the most important reasons people travel to LBL. Continued Maintenance of Open Lands is absolutely vital in order for the majority of visitors to view wildlife from the roadways.
87	3	Open Lands such as crop fields and wildlife food plots create viewing opportunities that are unique to NF lands and should be maintained in order for visitors to experience what truly makes LBL UNIQUE.
87	4	This desired condition will provide the continued opportunity to view wildlife for returning visitors and future generations.
117	1	open land is so critical to most peoples ability to view and study the wildlife on the area, it is critically important that it be maintained and enhanced for the good of all user groups. The edge created by the open lands is vital for the benefit of the many species who use this habitat, many of which or in decline on LBL. The open land is also critical to maintaining the carrying capacity of the hunted wildlife species on LBL, which is critical to one of LBL's most traditional user groups, hunters.

**Public Concern Number:** 15

**Comment Category:** Effects

**Concern Type:** Soils

**Public Concern Statement:**

Open land management activities are severely impacting the soils.

**Forest Service Response:**

The existing conditions and effects to soils are disclosed in Chapter 3 of this EA. Design criteria and best management practices reduce impacts to soils as discussed in EA.

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farming and other openland management is having a severe long term impact on the soils on which it is being practiced,we would like to see all of the row crop and hay farming stopped immediately, and have the program replaced with a very targeted openland management program.

**Public Concern Number:** 16

**Comment Category:** Effects

**Concern Type:** Soils / Water -  
Riparian

**Public Concern Statement:**

The Forest Service should consider the effects of open lands maintenance to water resources and riparian corridors at LBL.

**Forest Service Response:**

The effects to water resources and riparian corridors are disclosed in Chapter 3 of this EA. The 2004 Area Plan standards 20 and 35 for pesticides and riparian corridors in the 2004 Area Plan will be met. The effects to sensitive species are disclosed in the BAE.

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you are not considering the effects of maintaining open lands, particularly agricultural fields, adjacent to water resources and riparian areas at LBL

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The Open Lands project proposes to disturb land by tilling, mowing, and use of herbicides in order to create "early seral habitat" for wildlife. This land disturbance will occur in proximity to streams, wetlands, and other bodies of water. The LBL Land and Resource Management Plan's standards require undisturbed buffers of varying widths, not exceeding 100-feet, along water bodies

**Public Concern Number:** 17

**Comment Category:** Effects

**Concern Type:** Soils / Water / Wildlife

**Public Concern Statement:**

**Forest Service Response:**

The Forest Service should address the effects of the riparian corridor conditions on wildlife habitat, filtration capabilities, and water quality.

Riparian corridors by design provide filtration zones, protect water quality, and provide components of wildlife habitat preferred by many species. Riparian corridor function and form were considered in the analysis. Results of our investigation of wildlife habitat can be found in the EA and the project record. Site specific effects of maintenance of openlands are disclosed in Chapter 3 of this EA.

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<i>Letter Number:</i>	<i>Comment Number:</i>	<i>Comment Text:</i>
1	7	have never addressed the degraded condition of the buffers and the effects that may have on wildlife habitat and the ability of buffers to filter sediments, pesticides and fertilizers from streams
1	21	riparian buffers on LBL are overgrown with invasive weed species which are preventing the reproduction of native trees and shrubs within the buffers. The extension of the buffers as you propose in the standards referenced in #2 above will not provide sufficient width or canopy closure to stop this process

Public Concern Number: 18

Comment Category: Effects

Concern Type: Soils/ Water - fertilizer

**Public Concern Statement:**

The Forest Service should decrease the amount of fertilizers being used for open land maintenance.

**Forest Service Response:**

Fertilizer is a tool commonly used to increase productivity of a site, balance soil nutrient loads, manage plant composition, improve forage quality or, as part of an IPM strategy, control invasive species. The range of alternatives addresses the concern expressed here. Alternative 1 ceases all openland management (no fertilizer). Alternative 2 reduces the use of fertilizers from the present. Alternative 3 considers eliminating row crops, increasing wildlife plantings, and reducing the use of fertilizers even further. The effects of openlands maintenance, which includes the use of fertilizer, are disclosed in Chapter 3 of this EA.

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1	19	Fertilizers are an acknowledged source of non-point water pollution that is well documented in scientific literature. ...farmers' routine application of chemical fertilizers and manure to the land poses a far greater environment problem to freshwater lakes... (Carpenter 2005). Phosphorus in fertilizer slowly accumulates in the soils and then slowly leaches into adjacent waters, leading to plants and algae growth, i.e. eutrophication. (Carpenter 1998). The use of fertilizers on LBL should be analyzed to determine to what degree they are contributing to water pollution in LBL's lakes, ponds and the large surrounding lakes. the intensive long term use of all agricultural chemicals are threatening the water quality in and around LBL.
1	25	Carpenter, S.R., Caraco, N.F., et al, April 8, 1998, Non-point Pollution of Surface Waters with Phosphorus and Nitrogen, Ecological Applications 9, pp 559-568,Carpenter, S.R., July 19, 2005, Eutrophication of aquatic ecosystems, Bistability and soil phosphorus, Inaugural Article for Acceptance into the National Academy of Sciences, Proceedings of the National Academy of Sciences, Volumn 102, Number 29, pp 10002-10005
2	3	planting of clovers,alfalfa, and legumes such as soybeans, winter peas,etc will also add nitrogen to the soil at no cost compared to buying commercial fertilizer

**Public Concern Number:** 19

**Comment Category:** Effects

**Concern Type:** Wildlife

**Public Concern Statement:**

The Forest Service should consider the effects of open lands and forest cover on wildlife species.

**Forest Service Response:**

The cover types for LBL were determined in the 2004 Area Plan and accompanying FEIS. Variations in open land cover (cropland, warm season grasses, etc.) and their site specific effects have been considered in the EA. The site specific effects of openlands management on wildlife species are disclosed in Chapter 3 of the EA.

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1	22	Would changes in the types of open land cover (natural grasses) benefit any wildlife species?
4	4	what forest wildlife is inhabiting various blocks of forest and how those species' viability may be impacted by this farming and openland management.

**Public Concern Number:** 20

**Comment Category:** Effects

**Concern Type:** Wildlife - bats

**Public Concern Statement:**

**Forest Service Response:**

The Forest Service should consider the effects of pesticides on endangered and sensitive bats at LBL.

Endangered bats considered in the analysis for this project are the Indiana bat and gray bat. Effects of continued maintenance of open lands (including pesticides) on listed species (including bats) at LBL are disclosed in the BAE for this project and summarized in Chapter 3 of the EA.

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4	5	concerns about how the use of chemical pesticides might impact the viability of the gray bat, which forages over streams which could receive contaminated runoff... Pesticide contamination has been identified as a serious threat to endangered bats, such as the gray bat.
57	3	the gray bat is present in areas affected by farming and other openland management. We believe, even though Indiana bats have not yet been caught in LBL, that it is likely that they are present, especially in the fall around Tobaccoport cave. Farmland in a circle around that cave could be jeopardizing those bats. There are other sensitive bat species that may be affected.

**Public Concern Number:** 21

**Comment Category:** Effects

**Concern Type:** Wildlife - birds

**Public Concern Statement:**

The Forest Service should consider the effects of open lands on associated bird species and the effects of pesticides and increased edge habitat.

**Forest Service Response:**

Although there will be some changes in openland cover (cropfields, warm season grasses, etc.) the amount of openland habitats on LBL will be about the same as it is today. Openland habitat is essential for some birds, necessary seasonally for others, and utilized by many year-round. The site specific effects of openlands management on wildlife species are disclosed in Chapter 3 of the EA. Edge habitat is reduced in all the alternatives because there is a reduction in the amount of openings, with the most reduction in Alternative 1. Alternatives 2 and 3 have lesser reduction in edge habitat than Alternative 1.

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4	7	there have been population declines of some birds associated with 2 grasslands and shrub habitat, those species would have occurred historically at LBL in relatively low numbers, especially when compared with today.
97	3	I am concerned about the increase of edge where meadow meets woods. Increased predation and invasion (such as cowbirds) negatively affects wildlife.
97	4	Toxins such as herbicides and pesticides often are introduced in these areas [edge].

**Public Concern Number:** 22

**Comment Category:** Effects

**Concern Type:** Wildlife - deer / turkey / game

**Public Concern Statement:**

**Forest Service Response:**

The Forest Service should determine the effects supplemental food and cover has on game species including deer and turkey. The Forest Service should determine the effects of open lands management to white tail deer populations.

The site specific effects of open lands management on wildlife species, including game species, are disclosed in Chapter 3 of the EA.

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1	10	you have never addressed current population levels of demand species... You have never documented why population levels would be an issue without supplemental food and cover or what would the effects of a change in population density, particularly of white tail deer or turkeys. Would density changes result in changes in deer size, hunting effort, the type of hunting, tick population on LBL and the effects on the public and employees, wildlife viewing or car/deer crashes?
2	1	like to see commercial farming continue and expand if the acreage is cleared and feasible for ag crops.
2	2	the protein levels the deer get from soybeans is very important for bucks antler development and equally important to does as well. I would also like to see clover, wheat, oat, rye, and brassica food plots as well. The prescribed burns are also important to aide in the fresh growth of native plants which are useful to all forms of wildlife in LBL.
2	7	the deer herd number wise has declined dramatically. ... would like to see the deer harvest cut back somewhat to increase the herd numbers. ... Increased timber harvesting will add food, structure, and increase wildlife numbers.
4	14	Another important issue that the agency needs to consider is how this proposal is going to continue to increase the population of white tailed deer on LBL. The overabundance of white tailed deer on LBL is already having a significant impact on the ecology. Turkey overabundance could have similar impacts.

57 7 to create tremendous food supplies for these animals is only going to continue to increase their numbers. This has the potential to impact the balance of the forest ecology, in everything from the species composition of understories, to the diversity of the herbaceous undergrowth of forests, thus potentially impacting the entire ecology. In addition, there are human encounter impacts, such as an increase in car accidents hitting deer that have a significant economic impact.

87 2 It is also obvious that big game utilize the crop fields and its edges as a food source, especially during periods of snow, cold conditions, and during years of low acorn mast production.

**Public Concern Number:** 23

**Comment Category:** Effects

**Concern Type:** Wildlife - MIS

**Public Concern Statement:**

**Forest Service Response:**

The list of MIS is inadequate to determine effects to ecology from the open lands management.

The MIS were determined and discussed in the 2004 Area Plan and accompanying FEIS, therefore the MIS are out of the scope of this decision.

Project specific MIS disclosures are in Chapter 3 of this EA.

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57 2 the list of MIS is grossly inadequate to insure that there is significant damage being done to LBL's ecology with these activities. Without this information, there cannot be an accurate cumulative impacts analysis, both site specific and programmatic.

**Public Concern Number:** 24

**Comment Category:** Effects

**Concern Type:** Wildlife -  
reptiles/amphibians

**Public Concern Statement:**

**Forest Service Response:**

The Forest Service should assess the site specific effects of the continued maintenance of open lands on reptiles and amphibians and terrestrial habitat in the riparian corridors.

A literature review (“Open lands, management practices, and herpetofauna: are they compatible on LBL NRA?” by Richardson and Bloemer, 2007) was conducted to determine if the riparian corridor width/amphibian reptile concern was a significant issue for this proposed action. The site specific effects of open lands management to reptiles and amphibians, and associated habitat - specifically riparian corridors, were considered and found to be adequately addressed at project level, as discussed in this EA. The Area Plan FEIS, the literature review, discussions with the IDT and researchers indicate the concern is not significant.

The Area Plan and FEIS considered effects and riparian corridors throughout all habitats within LBL.

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1	4	National Biological Surveys (Lovich 1995)...response of turtles to habitat fragmentation... potentially occurring at LBL with fragmentation of core habitat due to maintenance of open fields... Mitchell 2000 found that the terrestrial habitat may be just as critical as wetlands in maintaining viable population of turtle species because many turtle species nest in uplands within 1 km of wetlands
1	5	There is no protection proposed for areas along ephemeral streams or lakes, bays, ponds or other impoundments, which are critical habitat for amphibians (Smeltsch 2005)

1	6	Smeltsch identified several species on reptiles and amphibians on LBL that had home range core habitats that far exceeded the terrestrial buffers along riparian areas on LBL.
1	24	Burke, Vincent J., Gibbons, J. Whitfield, December 1995, Terrestrial Buffer Zones and Wetland Conservation: A Case Study of Freshwater Turtles in a Carolina Bay, Conservation Biology, Vol. 9, No. 6, pp 1365-1369, Gibbons, J. Whitfield et al, November 7, 2005, Remarkable Amphibian Biomass and Abundance in an Isolated Wetland: Implications for Wetland Conservation, Conservation Biology, Volume 20, Number 5, pp 1457-1465, Lovich, J.E. et al, 1995, Turtles - Our Living resources: A report to the nation on the distribution, abundance and health of U.S. plants, animals, and ecosystems. U.S. Department of Interior, National Biological Survey, Washington DC, USA, p 902, Mitchell J.C. Klemens M.W., 2000, Turtle conservation - Primary and secondary effects of habitat alteration, Smithsonian Institution Press, Washington DC, USA pp 5-32, Smeltsch R, Brodie, R, (October 2003) Biological Criteria for Buffer Zones around Wetlands and Riparian Habitats for Amphibians and Reptiles, Conservation Biology Volume 17 Number 5, pp 1219–1228,
101	1	The maintenance of open lands will have a substantial and adverse effect on the terrestrial habitat of many amphibian and reptile species.
101	3	... many amphibians use terrestrial habitat... Semlitsch, R.D. and J.R. Bodie, 2003, "Biological Criteria for Buffer Zones around Wetlands and Riparian Habitats for Amphibians and Reptiles," Conservation Biology, Volume 17, Issue 5. The LBL buffer widths fall below even the minimum habitat use distance for all amphibian and reptile groups assessed in this comprehensive review. Of course, the LBL's buffers standards also fall well below the mean maximum distances for all amphibian and reptile species. Thus the LBL riparian buffers do not provide for the terrestrial habitat needs of most amphibian and reptile species. The LBL FEIS fails entirely to assess the effects of open lands maintenance on amphibian and reptile terrestrial habitat. Thus this EA must do so.
101	4	open lands maintenance that degrades virtually all critical terrestrial habitat for amphibians and reptiles is likely having a significant and adverse effect on these species. The fact that this degradation has been on-going for decades only heightens the adverse impact of past habitat destruction combined with the present and proposed future actions.
101	5	The use of pesticides and fertilizer as a part of open lands maintenance is likely to have a significant and adverse effect on amphibians... both singly and in combination with fertilizer and environmental variables, e.g., predators, have a significant and adverse effect on amphibians. Hayes, T.B., et al., 2006, "Pesticide Mixtures, Endocrine Disruption, and Amphibian Declines: Are We Underestimating the Impact," Environmental Health Perspectives Volume 114, Number S-1., Relyea, R.A., N.M. Schoepfner, and J.T. Hoverman, 2005, "Pesticides and Amphibians: The Importance of Community Context," Ecological Applications, 15(4), pp. 1125-1134, Relyea, R.A., 2005, "The Impact of Insecticides and Herbicides on the Biodiversity and Productivity of Aquatic Communities," Ecological Applications, 15(2), pp. 618–627, Relyea, R.A., 2005, "The Lethal Impact of Roundup on Aquatic and Terrestrial Amphibians," Ecological Applications, 15(4), pp. 1118–1124) Thompson, et al., 2006, "The Impact of Insecticides and Herbicides on the Biodiversity and Productivity of Aquatic Communities," Letter and Response Thereto by R.A. Relyea, Ecological Applications, 16(5), pp. 2022–2027

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Hazard quotients cited in Forest Service risk assessments are not based on data related to amphibians, consider only lethal levels of exposure and not developmental or other less-than-lethal adverse effects, do not consider synergistic effects from exposure to multiple pesticides and/or other agricultural chemicals, and are not based upon studies of pesticide exposure under environmentally realistic conditions,

**Public Concern Number:** 25      **Comment Category:** Proposed Action      **Concern Type:** Preference

**Public Concern Statement:**

**Forest Service Response:**

LBL should be forested; if no inland habitat, drop waterfowl hunter permits; and farming should not be allowed on LBL.

The vegetation cover is defined in the 2004 Area Plan and accompanying FEIS, and allows for row crops. The Area Plan identified openlands management as a component of the desired condition for LBL. Hunter permits are outside the scope of this decision. Comments during the 2004 area planning process were considered during plan development and appeal. The interdisciplinary team considered these comments for this project during internal scoping. Global issues are outside the scope of this decision.

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***Letter Number:    Comment Number:    Comment Text:***

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2	8	... either fisherman need to purchase a permit of drop the regulation for waterfowl hunters to have to buy them if LBL is not going to provided and inland place to hunt
27	1	I am against the practice of allowing commercial, chemical row crop and hay farming on LBL. For environmental and preservation reasons.
57	9	We all have commented on and appealed this program for the most part during the forest planning process. We incorporate by reference all comments, written appeals, and exhibits included in those submissions.includes a number of letters, meetings with LBL personnel, including a specific meeting to discuss this with Supervisor Lisowsky, comments on and appeals of the LBL management plan,

97 1 oppose farming in the land between the lakes (LBL).

97 5 Globally the need today is for massive reforestation. Flood control, transpiration toward more dependable rainfall, carbon dioxide sequestration, soil retention, wildlife diversification, are some of the cost benefits of global reforestation. Land Between The Lakes should be forested where possible as a national and global contribution.

**Public Concern Number:** 26      **Comment Category:** Proposed Action      **Concern Type:** Fertilizer

**Public Concern Statement:**

**Forest Service Response:**

The Forest Service should identify the rates and types of fertilizers used on LBL open lands.

Fertilizer types, uses and effects are included throughout the EA.

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***Letter Number:    Comment Number:    Comment Text:***

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1 17 I raised the issue of fertilizer applications on LBL in project scoping but there is no mention of the issue at all in your request for comments.

1 18 There is still no identification of the rates and types of fertilizers used on LBL for the continued maintenance of open lands even though the use of fertilizers is a connected action to maintenance of open lands.

**Public Concern Number:** 27      **Comment Category:** Proposed Action      **Concern Type:** Heritage

**Public Concern Statement:**

**Forest Service Response:**

The Forest Service should designate LBL a Traditional Cultural Property (TCP) as defined by NHPA

TCP is outside the scope of this decision. The Forest Service has complied with NHPA and NEPA in all respects.

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we support designating LBL as a Traditional Cultural Property for those former residents that are pursuing that designation. What we see LBL doing in response to that request is basically not addressing it. We don't believe that complies with the Historical Protection Act, or NEPA.

**Public Concern Number:** 28

**Comment Category:** Regulations

**Concern Type:** NEPA - EIS

**Public Concern Statement:**

The Forest Service should complete an EIS for the continued maintenance of open lands because there are significant effects from pesticides, the project is not covered by the Region 8 Vegetation Management EISs, and the proposed action is a major federal action.

**Forest Service Response:**

The environmental effects of the proposed action are disclosed in this EA. The actions will not have a significant effect on the quality of the human environment considering the context and intensity of impacts (40 CFR 1508.27). The finding of no significant impact is disclosed in the decision document titled Decision Notice and Finding of No Significant Impact. Therefore an environmental impact statement will not be prepared.

The Area Plan and accompanying FEIS recognize the use of pesticides in maintaining openlands. This EA discloses the analysis of pesticides and a summary of the effects.

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***Letter Number: Comment Number: Comment Text:***

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1	20	your analysis to date seems very superficial considering the extent (thousands of acres), duration (the past 50 years and the future 10 to 15 year life of the forest plan) and frequency (one or more times per year) that you will be applying pesticides, herbicides, fungicides and fertilizers to LBL. This analysis needs to be documented in an Environmental Impact Statement because of your inability to realistically prepare a Finding of No Significant Impact.
4	17	Because of the above (comment 14), we continue to believe that this proposal is a major federal [action] that would require an EIS.
57	11	We believe, based on the severity of the impacts of the proposal, and the significance of having large scale commercial row crop and hay farming operations on a public land base, that this proposal constitutes a major federal action which should be subject to a detailed EYES [EIS] with full public involvement.

101	6	The LBL LRMP FEIS makes no disclosure whatsoever of the effects pesticides are likely to have on the environment.
101	7	None of the three Region 8 Vegetation Management EISs covers the LBL.
101	13	The Forest Service must consider and disclose these potentially significant effects in a site-specific environmental impact statement ("EIS") that considers the scientific evidence of toxicity in the specific context of the LBL and its open lands maintenance project.

**Public Concern Number:** 29      **Comment Category:** Regulations      **Concern Type:** NEPA / ESA

**Public Concern Statement:**

**Forest Service Response:**

The Forest Service must consult with the U.S. Fish and Wildlife Service as required by Section 7 of the Endangered Species Act. The Forest Service should conduct analysis of effects as required by NEPA.

The consultation with the USFWS is documented in the BAE and the project record. The requirements of the ESA have been met. Effects of the alternatives on wildlife species are disclosed in the analysis in Chapter 3 of the EA, as well as the project record. The requirements of NEPA have been met.

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***Letter Number:    Comment Number:    Comment Text:***

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101	9	Consultation with the U.S. Fish and Wildlife Service, whether pursuant to Section 7 of the Endangered Species Act or ad hoc, is not a substitute for analysis required by NEPA.
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**Public Concern Number:** 30

**Comment Category:** Regulations

**Concern Type:** NFMA

**Public Concern Statement:**

The continued maintenance of open lands violates NFMA regulations because 36 CFR 219.27 is not met and requirements to protect streams, insure viability, provide recreation, and maximize net public benefit.

**Forest Service Response:**

The 1982 planning regulations are no longer in effect with regard to projects implementing Forest Plans, including LBL's 2004 Area Plan. Therefore, the regulation referenced, 36 CFR 219.27 (2000), is not applicable to the project. Additionally the Continued Maintenance of Open Lands Project, including use of row crops and an integrated pest management strategy, is consistent with the National Forest Management Act of 1976 (NFMA), the Multiple Use Sustained Yield Act of 1960, and the 2004 Area Plan.

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***Letter Number: Comment Number: Comment Text:***

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4	2	violated NEPA for a long time, does not comply with a number of NFMA's requirements such as to protect streams, insure viability of native wildlife, provide safe and quality recreation, and maximize the net public benefit.
101	12	Commercial corn and soybean farming of LBL's arable bottomland habitat is incompatible with the National Forest Management Act's implementing regulations. The NFMA's regulations require that all management prescriptions meet certain minimum management requirements. See 36 CFR 219.27. Corn and soybean farming requires the use of pest management strategies that are not "in the long term, ecologically acceptable and compatible with the forest ecosystem and the multiple use objectives of the plan." Id (a)(3)(emphasis added). Far from being compatible with the forest ecosystem, corn and soybean farming replaces the natural forest ecosystem altogether. In fact, pesticides associated with corn and soybean farm are being used to prevent the natural reestablishment of the forest ecosystem. Thus, the use of pesticides in association with corn and soybean farming violates this NFMA minimum management requirement.