June 20, 2007

Ann Long-Voelkner,
Chippewa National Forest Supervisor's Office
200 Ash Avenue NW
Cass Lake, MN 56633
alongvoelkner@fs.fed.us

Re: Chippewa National Forest Off-Highway Vehicle Road Travel Access Project

The Minnesota Native Plant Society is submitting these comments on the Chippewa National Forest Off-Highway Vehicle (OHV) Road Travel Access Project. We are a 25-year old organization dedicated to the identification, life histories, conservation, and appreciation of Minnesota's Native Plants. Our membership brings together professional botanists and distinguished academicians with avid naturalists, gardeners, and photographers.

We are submitting these comments and, under separate cover, copies of cited papers and reports, for your convenience, except for the large body of work prepared by the Minnesota Department of Natural Resources, referenced below as Minnesota's Comprehensive Wildlife Strategy, for which you can obtain the document at http://www.dnr.state.mn.us/cwcs/strategy.html.

1. Non-native invasive plant species present on the Chippewa National Forest are a top ecological threat to these USFS lands, and have been identified by Dale Bosworth, former Chief of the U.S. Forest Service, as one of the four top threats to the nation's forests and rangelands. In the Chippewa, there are thirteen species of ingenious propagators, producing enormous amounts of seed with a variety of dispersal mechanisms. Invasives as a group are a major drain on the national, state, and local economies, costing the country roughly $138 billion each year, according to the USFS document "National Strategy and Implementation Plan for Invasive Species Management";
2. An OHV will spread non-native invasive species very, very effectively in several ways, including that:

a. as is commonly known, the OHV driver travels readily back and forth between a variety of land cover types and into a wide variety of more remote and ecologically sensitive natural areas, even when those areas are technically off-limits, thus opening all areas to the potential for being disturbed by invasive propagules
    i. Huebner, C.D. and P. C. Tobin. 2006. Invasibility of mature and 15-year-old deciduous forests by exotic plants.;
b. the OHV tire size and configuration will very efficiently denude and thus transport large quantities of soil, and when driven through an infestation, transport a high concentration of propagules, and then afterwards deposit those propagules at great distances:
    i. Schmidt,W. 1989. Plant dispersal by motor cars. Vegetatio **80:**147–152.;
c. OHVs often are driven on roadsides, where thick infestations of non-native invasive species are most likely to exist:
    i. Duncan, C, J. Story, and R. Sheley. 2001. Montana Knapweeds: Identification, Biology, and Management. Montana State University.;

3. OHV routes should not be designated in any areas known to be infested with any non-native invasive species, or areas thought to be more likely to be infested, or in environments most susceptible to being invaded if the same route or a connected route also traverses areas likely to be or known to be infested with non-native invasive species, because of the edge effects which can be created up to 40m from the route
    i. Matlack, G. 1994. Vegetation dynamics of the forest edge – trends in space and successional time. Journal of Ecology. 82, 113-123.
    ii. 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, 249-259.;
4. OHVs should not be permitted to travel on roads that run through or near to sugar maple and other northern hardwood stands, thereby introducing another stressor to those stands which the Environmental Assessment Wildlife Report identifies as the most susceptible communities to earthworm-caused damage;
5. The ability to find places for watching wildlife or for enjoying or studying rare native plants and high-quality native plant community assemblages in a remote natural setting, without the interference of OHVs, is itself rare and becoming rarer;
6. Actions that accelerate the rate or extent of spread of non-native invasive species will damage soils, water quality, vegetation, and habitat for wildlife, for which there may be up to 27% of the state's population of mammal Species in Greatest Conservation Need, 22 federal and state threatened, endangered or special concern species, sensitive plant species such as the goblin fern and several other rare moonwort species known in the Chippewa:
    i. Minnesota's Comprehensive Wildlife Conservation Strategy 2006. Chippewa Plains Subsection Profile. Minnesota Department of Natural Resources.;

7. Designating OHV routes through areas that are in fact infested with non-native invasive species will greatly accelerate the spread of non-native invasive species;
8. Designating hundreds of miles of routes without reasonably complete knowledge of where all non-native invasive species infestations are located on the Chippewa National Forest will likely result in designation of many routes that are presently infested with one or more non-native invasive species;
9. OHVs will rapidly spread non-native invasive species to many intersecting routes, including some undesignated routes, making it very difficult and perhaps impossible to control, eradicate, or even effectively manage and monitor the spread of non-native invasive species on the Forest, much less reduce the spread of terrestrial or aquatic non-native inveasive species that pose a risk to native ecosystems, as is called for in the Chippewa National Forest's Forest Plan on page 2-33;
10. The project at issue has the capacity to do tremendous damage to the environment because it involves a highly efficient mechanism for spreading non-native invasive species, and project planning has occurred in the absence of reasonably complete knowledge of all non-native invasive species locations, or even those representing the highest ecological threat levels;
11. Extensive surveys for all non-native invasive species should be conducted on all road, other motorized travel corridors, and proposed route alternatives at the earliest possible time, particularly since over well over half of all Chippewa and Federal lands are within half mile of route alternative;
12. The project is likely to cause significant environmental effects and requires a full Environmental Impact Statement, in part due to the unknown impacts on Minnesota Species in Greatest Conservation Need (SGCN), a group of species representing a threshold level for significant effects. The EIS should proceed only after a comprehensive survey of SGCN and concurrent with or after non-native invasive species surveys have been completed on all road and other potential travel corridors within the Chippewa National Forest statutory boundary likely to have a moderate risk of infestation by a non-native invasive species with a moderate, high, or very high ecological risk categorization by the USFS. These species include all those terrestrial plant species listed as occurring on the Chippewa, as well as exotic earthworm infestations surveyed according to level of infestation. In the estimation of the Minnesota Native Plant Society, infestations of haplotype common reedgrass and hybrid cattail should also be surveyed, since extreme OHV use can include marshy areas.
13. The above comments are consistent with direction in the Chippewa National Forest's current Forest Plan, including specifically direction regarding soils, vegetation management, wildlife, threatened and

endangered species, non-native invasive species, social and economic stability, recreation, trails, and recreational motor vehicles.

This completes Minnesota NPS' comments on the Project. Thank you for the chance to comment, and please contact the Society Board Member and Conservation Committee Chair through our website, www.mnnps.org/board.htm, if you have any questions.