

**2018 Northern Highland-American Legion (NHAL) State Forest Master Plan Variance:
Comments from the Wisconsin Chapter of The Wildlife Society and Wisconsin's Green Fire:
Voices For Conservation.**

July 03, 2018

Cameron Bump
Wisconsin DNR
1300 W Clairemont Avenue
Eau Claire, WI 54701

Hello Cameron,

Thank you for your recent phone conversation. You helped answer questions about the 2018 Draft NHAL State Forest Master Plan Variance. It was hard to follow how the 2017 Master Plan amendment related to this 2018 variance proposal and you were very helpful in helping us understand the intent of the 2018 draft variance.

I represent Forest Issues for the Wisconsin Chapter of The Wildlife Society and Wisconsin's Green Fire: Voices For Conservation.

We support the 11.09-mile "Bucket B" ATV route proposed in the 2018 variance.

We do not support portions of the 42-mile 2017 "Bucket A" ATV route proposal.

Reasons we do not support portions of the 2017 "Bucket A" proposal include:

- Portions of the route go directly under active osprey nests. The Department has species guidance documents. These guidelines protect state listed Species of Special Concern including the osprey. Forest Certification requires state forests follow internal rules and guidelines.
- The route goes through the Cunard Lake campground quiet area.
- The route crosses certain wetlands.
- Portions of the route conflict with the Wisconsin Valley Improvement Company's (WVIC) FERC Recreation and Wildlife Habitat Plan.
- There is a dead-end loop east of CTH "O" which is contrary to ATV route guidance and this small loop ends at the WVIC FERC Project area along Sugar Camp Creek. Sugar Camp Creek is an important wildlife area.

We understand that the Department has been working with stakeholders to develop the best possible ATV routes on the NHAL. We request being an active participant in future discussions of ATV routes.

Here is background information and a more detailed explanation of our lack of support for portions of the 42-mile 2017 “Bucket A” ATV route proposal:

During the 1980s and early 1990s WDNR and the Wisconsin Valley Improvement Company (WVIC) worked together to protect wildlife habitat (wetlands, open sand bars, and endangered species), enhance waterfowl hunting, and control erosion at the WVIC’s Rainbow Flowage property and adjacent WDNR lands in Oneida County. The Rainbow Flowage area includes the flowage itself and flowage easements along the Wisconsin River and Sugar Camp Creek. WVIC flowage land was surrounded by the NHAL State Forest.

WVIC and DNR developed a Memorandum of Understanding to protect wildlife habitat and prevent erosion during periods of low water when the flowage bed was accessible by trucks and ATVs. WDNR and WVIC cooperatively erected signs, closed some roads, and patrolled the area to limit damage. The combined efforts protected the flowage bed, assured undisturbed waterfowl hunting, protected migrating shorebirds (the Rainbow is a significant shorebird migration stop in most years), and prevented disturbance to a large population of nesting bald eagles and ospreys.

The cooperative program also worked to protect the Rainbow Flowage’s osprey population. Ospreys began erecting nests on the electric transmission line that runs on the north and west sides of the Rainbow Flowage. Over a 30-year period the transmission line managers, American Transmission Company (ATC) with help from Wisconsin Public Service Corporation (WPS), erected nest platforms on the transmission line to secure osprey nests. This was a significant and costly effort by ATC and WPS to assist the osprey population and it continues today as osprey pairs establish more nests along the transmission line. The effort is a great success with ospreys now nesting in secure platform nests with easy access to the Rainbow Flowage fishery.

Today, the former WVIC lands are state-owned within the NHAL State Forest and FERC boundary.

Concerns

The 2017 Recreation Plan Amendment (Map G) lists a possible (dotted line) ATV/UTV trail immediately under a portion of the transmission line and within the WVIC FERC boundary of the Rainbow Flowage. If constructed, an ATV/UTV route directly under the transmission line’s osprey nests would cause osprey nest failure and would not be consistent with DNR’s established osprey nest protection guidance. An ATV/UTV trail within the Rainbow Flowage FERC boundary would not be consistent with the recreation and wildlife habitat plan of the current FERC-approved Rainbow Flowage project.

The 2017 NHAL Recreation Plan Amendment (Map G) shows a small ATV/UTV segment running east from CTH “O” to Sugar Camp Creek. Sugar Camp Creek is part of the Rainbow Flowage

FERC area and is a sensitive wildlife habitat (bald eagles, ospreys, waterfowl, shorebirds, wetlands and waterfowl hunting). This short ATV/UTV trail segment is not consistent with the 2017 NHAL Plan Amendment's trail guidelines listed on page 12. The proposed trail is just a short loop that is not a regional connection, would substantially impact natural resources, is not consistent with legal policy (FERC license), and would interfere with existing recreational uses of the Sugar Camp Creek area.

For additional information on Species of Special Concern, Species Guidance documents, and the location of osprey nests please contact Wildlife Biologist Michele Woodford and Conservation Biologist Carly Lapin. For information on State Forest Certification contact Teague Prichard.

Thank you for this opportunity to comment on these important wildlife habitat issues.

Sincerely,

Ron Eckstein
Forest Issues
WCTWS, WGF:VFC
5059 Sunset Drive
Rhineland, WI 54501
715-369-2979