

DATE: July 26, 2019

TO: Signers of July 17, 2019, Memorandum (*see attached list*)

FROM: Sarah Strommen, Commissioner
Department of Natural Resources



PHONE: 651-259-5022

SUBJECT: Response—Sustainable Timber Harvest Analysis and Wildlife Management Areas

I want to thank you for your July 17, 2019, memorandum, in which you expressed concern about impacts to wildlife habitats and populations on wildlife management areas (WMAs) as we implement the results of the Sustainable Timber Harvest Analysis (STHA). I appreciate your willingness to voice your concerns.

My leadership team and I are deeply committed to the conservation of Minnesota's biological diversity; the quality of its lakes, rivers, and streams; healthy populations of game and fish species; high quality recreation opportunities; and healthy forests that help support a strong forest products industry. The Commissioner's Office and the division and regional directors paid close attention to the issues you raise from the beginning of the STHA project—as did staff and stakeholders. As a Department with multiple management objectives, we have worked very hard to balance these objectives on DNR-administered lands.

The STHA used the best data we have and explored many alternatives. In fact, most of the staff and modeling effort focused on understanding issues around non-timber values. All of that analysis informed the conclusion that the DNR can offer 870,000 cords of timber from state-administered lands each year—and can do so in a way that is sustainable for both timber and non-timber natural resources and values.

I would like to highlight a few key parameters that helped inform our sustainable harvest decision. While the DNR manages more than 5 million acres of land in the forested part of the state, only 2.7 million of those are “merchantable” and available for harvest. Some of those non-merchantable lands are not considered forest, but many are—including state parks, scientific and natural areas, Shipstead-Newton-Nolan buffers, designated old growth forest stands, and stands deemed “inoperable” from a timber harvest perspective because of accessibility or terrain. These non-merchantable forest lands contribute to our overall biological diversity and wildlife habitat goals.

In addition, we modeled allowances for rare species, riparian buffers along streams and lakes, and best practices set out in the Minnesota Forest Resource Council's site-level guidelines. For the first time, we modeled Fish and Wildlife (FAW)-administered lands differently from Forestry-acquired lands and other administrative categories. Specifically, we extended the normal rotation ages for forest stands on FAW-administered lands well beyond the ages typically used in managed forests in Minnesota and we increased the proportion of each stand reserved from harvest.

It is clear in authorizing language that WMAs are to be managed primarily for quality wildlife habitat, and the STHA's model prescriptions for WMAs reflect this. This does not, however, preclude management for additional objectives that are not incompatible with this primary purpose. In the case of forest management, timber harvest can be an important, complementary tool in pursuing habitat objectives. Every management action we take benefits some wildlife species but not others, and timber harvest decisions are no exception. Across Minnesota, we work to conserve biodiversity and manage diverse populations—this can't be accomplished successfully on any one Division's land base or in a single geography. Recognizing this, the ongoing WMA planning effort is a vital step in ensuring that our management of individual WMAs contributes clearly and effectively to DNR's statewide biodiversity and habitat goals.

It is also important to recognize that some WMAs include school trust lands, which means their primary focus is generating revenue for the trust. Others include Con-Con lands that received WMA status with an understanding that timber harvest would continue much as it had before becoming a WMA.

I also want to take a moment to address some of the more specific concerns you raised in your memo:

- **Twelve percent target on FAW-administered lands:** We established this target to help ensure timber offerings and habitat planning have some predictability and uniformity going into the future. This percentage represents a small reduction in cords offered compared with the past ten years.
- **Flexibility:** We agree that flexibility is important to successful implementation of our forest management objectives. In maintaining that flexibility over time, it is important that today's decisions do not unduly limit our future flexibility. Current options on WMAs are, in some cases, limited by past decisions to defer harvest. Regardless, more than 20 percent of the stands selected by the implementation model were dropped or swapped in the ten-year stand adjustment exercise. Some flexibility is still to be determined—as we develop the next round of subsection forest resource management planning, as stands are appraised and marketed, and as we prepare to release candidate lowland conifer old growth stands. We can work together in these next steps to use this flexibility to meet spatial and landscape habitat issues.
- **Species targets:** These are an important component of the STHA decision. I want to be clear that we developed them for a range of species and cover types, not only aspen. Targets by species help ensure we do not overharvest sought after species like aspen or overlook the need to examine and manage stands that are less marketable. They also send a clear signal regarding DNR offerings to the timber market, which is an important part of the state's goal of being a predictable supplier.
- **Local manager discretion:** Throughout our series of expanded regional Forest Resource Issue Team (FRIT) meetings and the recent Wildlife Section meeting, we have heard a consistent concern that implementing the STHA model will constrain local manager discretion. It is true that the sustainable timber harvest number incorporates important parameters that do narrow the decision space for area

managers. This was done intentionally to foster consistency, efficiency, and effectiveness in our forest management, while also reducing conflict at the field level. The reduction in local discretion holds true for Forestry staff as well as Wildlife managers. I do want to emphasize, however, that there still is field-level discretion to make adjustments as well as to develop stand-specific prescriptions that provide fish and wildlife habitat benefit.

- **Area-specific examples:** Annual stand examination coordination will best address many of the issues you raise in your area-specific examples. It is important to remember, the STHA is a ten-year stand examination list, not a ten-year cut list. Harvest offerings will continue to be refined as we visit stands and evaluate their condition. Depending on markets, there may be future opportunities to defer stands from harvest. Questions like these, and others that may have broader implications, should be advanced through Divisional channels or brought to your regional FRIT for consideration. I will pass your specific area suggestions and concerns on to the Division Directors as well, so they can read your thoughts first hand.

The STHA represents a big change in how we do forest planning and management. Inevitably, change of this magnitude raises concerns and uncertainties, and requires flexibility on everyone's part. I want to assure you that, at its core, our implementation of the STHA target is designed to be adaptive. The plan includes a formal check-in after five years to evaluate short-term outcomes of the modeling, subsequent harvest offerings, and other STHA decision elements. However, we will be monitoring implementation continually and seeking to learn from any issues that emerge through our established dispute resolution processes. We can—and will—make interim adjustments if needed.

DNR staff and the natural resources we manage are resilient; and I am confident the approach we are using will, over time, result in better outcomes for all of our forest management values.

I want to thank you for your deep commitment to our natural resources. Your passion not only is commendable, it is a credit to the people of Minnesota who entrust us with this important work.

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