DEPARTMENT OF NATURAL RESOURCES

Internal Memo

Date: 17 July 2019

To: Commissioner Sarah Strommen and Assistant Commissioner Bob Meier

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RE: STHA and WMA Management

We are writing to first-of-all express our full support for the Department efforts to manage Wildlife Management Areas for wildlife habitat. We also remain committed to our direction to find 870,000 (+30,000) cords of timber as identified through the Sustainable Timber Harvest Analysis (STHA). We understand the Department's direction to meet both timber harvest and wildlife habitat management goals. However, it is our opinion that in order to partially mitigate the negative effects of annually harvesting 870,000 (+) cords to a large number of wildlife species, there must be changes to how the STHA is being implemented. We are providing some suggestions that, if implemented, would improve the STHA implementation process and better minimize losses to important wildlife habitat.

If STHI continues as currently planned, the 870,000(+) cord goal will possibly be met, but we do not believe it is scientifically honest or transparent to say that the 10-year timber plan is "beneficial to wildlife", especially on WMAs. Some WMAs will not have adequate old forest left for old-forest obligate species, while others (primarily in the Aspen Parklands Subsection) will have too much old forest left to meet habitat goals of open landscapes.

What is needed to make the STHA goal compatible with managing WMAs for wildlife diversity and long-term conservation is to:

- **Lower the wildlife target acres from 12% of total harvest** to a level chosen by wildlife managers for habitat on wildlife-administered lands. 12% is too high because it does not allow for consideration of desired future habitat conditions, does not allow WMAs to provide habitat that is otherwise lacking on the landscape, and does not maximize habitat value. 12% was based on past harvest levels on wildlife lands that were temporarily high to

address an age-class imbalance that has since been rectified. The current harvest targets for wildlife lands are too high to maximize habitat value and ecological function for a diverse set of species on WMAs.

- **More flexibility** in the location where acres are chosen for timber harvest. Currently there have been acreage targets set for WMAs that don't reflect the locations where additional timber harvest is beneficial and/or detrimental for habitat, and trading between areas has not been allowed (except for 4,000 acres of aspen trading in the Aspen Parklands, which is not enough). **Solution:** Allow the Division of Fish and Wildlife to decide where to harvest timber on Division-managed lands. Timber harvest can be a valuable habitat management tool for some species, but on WMAs/AMAs, harvest should be employed where there will be clear need and benefit to harvest, such as maintenance of open landscapes.

- **More flexibility** between cover types. The STHA only sets written goals for aspen. However, strict area-specific goals have been set by the STHA for other cover types such as oak, which when harvested is detrimental (in some areas) to wildlife habitat. **Solution**: Allow the Division of Fish and Wildlife to decide what species should be harvested within WMAs and AMAs.

- **Prioritize** stands within and between Annual Stand Exam Lists so that stands in WMAs and MOAs are appraised and sold last – unless given a higher priority by the wildlife manager. Then, drop these stands from harvest consideration if they are not needed to meet cordage goals and harvest does not result in a net benefit to habitat.

We respectfully ask you to consider these changes to the STHI in order to achieve timber harvest goals with the least impact to wildlife habitat on WMAs. We have listed on the next two pages a few examples (there are many more examples) from each of our areas to illustrate how the STHI, as it is currently planned, will negatively affect wildlife. We would appreciate your thoughtful consideration and support for these modifications and are willing to meet to discuss this issue in more depth. Our suggestions will allow for both proper management of WMAs and we believe they are still supportive of the larger STHA. Thank you.

Examples from Area Wildlife and Fisheries Offices

Bemidji – WMA oak stands have been selected for harvest in order to meet the STHI goals. These are 80 to 120-year-old oak stands in prime condition that are producing large amounts of acorns for wildlife food annually, and can continue to do so for another 200 years. They also provide cavities for wood ducks and other cavity nesting birds and mammals. The "old" aspen stands on WMAs are all being cut at 60 years old, which is before they produce cavities large enough for many species. If oak trees are harvested as well, wood ducks, fishers, and other cavity nesters will have few options. Between wildlife food and cavities, oaks likely provide more for wildlife than any other tree species, and can live for 300+ years. We see absolutely no wildlife management purpose, and instead a wildlife management detriment, to harvesting any more oak on the WMAs in our work area.

Crookston – Crookston Wildlife staff manage WMAs in both the Hardwood Hills and Aspen Parklands Subsections, but we are generally more concerned about the STHI selections in the Hardwood Hills. Several WMAs that we manage in the Hardwood Hills have been heavily targeted for harvest by STHI, and because of high WMA acreage targets in Hardwood Hills, we do not have options to swap stands. This means that harvesting on these units will meet fiber production goals, but will not optimize habitat or recreational use on these units.

Pressure to meet cordage goals on WMAs in the Hardwood Hills has caused all of the oak on several WMAs, or in one case, all of the forested acreage on a WMA to be targeted for harvest. In addition, many of these forest stands are riparian areas, or adjacent to designated old growth stands and do not represent harvests that Wildlife staff would initiate to improve habitat. These harvests will dramatically influence wildlife and the public use of these WMAs. We also have one unit, Polk WMA, where every stand of tamarack has been identified for clearcutting. Tamarack stands are a unique forest type in this area of Minnesota, and clearcutting all of these acres on this WMA is not appropriate.

Duluth - On some WMAs and RGMAs, a very high percentage of older aspen stands have been selected for harvest in the next 10 years (including **all** remaining stands at or beyond rotation age in some WMAs) to meet timber goals. In one case, an entire unit of nearly 2,500 acres (~400 acres Trust Fund Land) will have been treated in a 30-year period. WMA lands are the only public lands currently providing significant old forest habitat in our work area. During SFRMP planning, we intentionally selected stands within WMAs as designated Extended Rotation Forest (ERF) to provide habitat for fisher and marten along with wintering deer and moose. As a result, all or most remaining stands within our WMAs were selected for treatment since most are currently older than 60 years. The WMAs in our area will no longer support adequate habitat for many species and will instead simply resemble the surrounding younger forest matrix.

International Falls – Managing forest wildlife habitat can be complicated by sharing an area of interest (such as a riparian corridor, deer wintering area, or ruffed grouse management area) with various landowners. This is typical within the International Falls area. Most of our ownership-based forest management decisions occur independently which often results in unforeseen harvesting - affecting the broader habitat mosaic. Planning the state land out 10 years with limited flexibility to swap or defer harvest can result in a completely unanticipated and undesirable outcome. We will see an increase in occurrences such as a small block harvest on state land becoming an unexpected large block if the adjacent non-state land is cut at the same time. The ability to react to what occurs on other ownership needs to be adaptive to a certain degree and not entirely prescriptive; otherwise, the results are essentially arbitrary. Less harvest on WMAs is required in order to allow WMAs to support habitat that is lacking on the surrounding landscape.

Karlstad – The STHI goals call for far fewer stands to be examined (thus potentially harvested) than is needed to meet Aspen Parklands habitat objectives in the Karlstad work area. Commercial harvest of mature aspen has been a valuable tool toward reaching the "desired future forest composition" (DFCC) for this subsection and work area. As currently outlined in the new STHI, less than half of both the acreage and the number of stands is scheduled to be examined over the next 10 years, than was in the previous SFRMP. More timber harvest is needed to benefit our open land and brushland-dependent species such as sharp-tailed grouse.

Little Falls – A high proportion of timber stands on our local WMAs were selected for the 10-year cycle, and in some cases representing 50-75% of an individual WMA. In a few cases, we were also unsuccessful in moving timing of the cuts to lessen disturbance. We are also concerned about lowland hardwood, ash, and tamarack stands that were selected for clearcutting that for the most part don't appear to be very marketable, and very concerned that we won't realize effective regeneration and thus lose significant forest-wildlife benefits. A fair number of our oak stands (below, at, and over rotation age) were also selected for clearcutting, and we are reluctant to allow that as we have plenty of time over the next 30 years to follow a thinning, shelterwood, regeneration sequence long before the stands are lost. Finally, and perhaps most importantly, we have many stands selected that have significant buckthorn infestations that forestry refused to take off the list. We will not allow entry into those stands, or will significantly reduce what can be harvested, if they haven't been treated for buckthorn prior to the stand exam year. This will undoubtedly create some conflict. Our agency has to start allowing DNR, not just our partners, to chase OHF funds to implement contract buckthorn control. Short of that, we will be butting heads during stand exams, have more disputes to resolve, and/or significantly, and likely permanently, degrade many of our oak and mesic hardwood stands on WMAs in the Little Falls work area over the next decade, and wildlife and sportsmen/women will be significantly impacted.

Mille Lacs WMA – Mille Lacs is an extremely popular, heavily visited WMA with a long history of research and management focusing on sustainable habitat and timber production. Existing age classes are well balanced in most cases due to past management. However, STHA goals have significantly increased harvest pressure on the Mille Lacs WMA over any previous timeframe and will have long-term impacts on wildlife habitat and wildlife populations. In order to meet cord targets in aspen, all stands over age 28 will need to be harvested, including all previous reserve patches. All black ash stands in the WMA will be harvested to meet goals. Overall 36% of the forested habitat in the Mille Lacs WMA will be treated in a 10-year period.

Red Lake WMA – Pressure to harvest timber has already made once-common habitats become rare on Red Lake WMA and implementation of STHA will exacerbate this trend. For example, many native plant communities historically contained about 50% old forest, but STHI will drive this close to 0% for some communities on this WMA. Diversity within and between forest stands will also decrease because of this pressure. This is an astonishing departure from managing to increase climate change resilience and managing for maximum production of wildlife on WMAs. The Red Lake WMA plan has not yet been written, but, unfortunately, the forested habitat goals for the WMA are now being set for the next 10 years without an opportunity to consider desired habitat conditions.

Thief River Falls – The current STHA process has in effect undermined the original intent of the 2012-2021 Aspen Parklands SFRMP—specifically to evaluate 100% of the aspen acres within two 10-year planning cycles. As has been stated many times, the acres of aspen/BAM that the STHI process has selected will fall short of the original planned goal by over 10,000 acres. Commercial aspen harvest can be a very important wildlife habitat management tool in the Aspen Parklands if implemented as planned. Development of the new 10-year plan through this stand selection process will further compromise the long-range goals of this planning area. Much more timber harvest is needed in the Thief River Falls work area.

Tower – A very high percentage of older aspen stands on forested WMA land were selected to meet **timber** goals. Older aspen (50+) with a significant conifer component is critical for winter deer habitat in northeast Minnesota. This rotation age and level of harvest, in the aspen covertype, will eliminate critical habitat for wintering deer, denning and resting habitat for fisher and marten and numerous other cavity-dwellers (e.g. bats, songbirds, ducks, owls, squirrels, etc.), and habitat needs for many other wildlife species on WMAs. WMA lands are the only public lands in many areas providing significant older aspen forest habitat. Harvesting at this level of intensity jeopardizes long-terms conservation of many wildlife species dependent on older forest for all or part of their life cycle and habitat needs.

Two Harbors – The majority of the WMAs in the Two Harbors wildlife work area are historic deer yards where deer travel long distances to escape heavy snow cover above the ridge. It is critical that we have the flexibility to maintain large areas of mature conifer cover in these units. In a few of our WMAs, every single conifer (except cedar) and most Aspen/Birch/BAM stands were selected for harvest. We were able to remove some younger stands from the list, but the majority remain selected. The biggest problem we face with management of these units is that many of them are WMAs on trust land, or have mixed acquired and trust status where flexibility is not an option. **Another critical issue** in the Two Harbors area is the number of acres selected on Fisheries-acquired AMA lands in Lake County. Many of these lands fall within critical moose and lynx areas, some contain Hunter Walking Trails, and many are getting older and thus are selected for harvest in the 10-year pool.

Whitewater WMA – In order to meet the STHA on WWMA, all oak stands at or over normal rotation age were selected, which represents approximately 75% of the oak on the entire WMA. The remaining 25% has already been harvested and is under rotation age. This will dramatically change the age structure on the entire WMA, leaving very little older oak forests critical for wildlife. Additionally, this level of harvest will put the entire WMA at risk for severe invasive species infestations, as we do not have the funding to support this amount of invasive species management. Invasive species are a real and significant threat for SE MN forests. As a result, we will have a difficult time regenerating quality oak forests in this area.

Additional Background and Statewide Concerns:

- As stated in the beginning, we appreciate the challenges of mixed-use land management, will respect final decisions, and will do our best to implement them. However, we also feel that expression of our concerns is not only our public trust responsibility, but also consistent with Department goals of supporting sound science, encouraging transparency and healthy discussion, and is consistent with a culture of respect.
- Although our concerns are diverse, including areas where we are concerned about *insufficient* harvest, many of our concerns are related to maintenance of adequate old forest habitat for the many species that depend on it. As noted in the STHA final report, even *before* any new harvest is initiated, only ~26% of 'hexagons' on state lands are estimated to currently meet the (minimum) habitat needs for old forest species, and this number is projected to decline with the new harvest regimes, especially in some areas. This is of great concern to us and in some cases could (along with other factors) increase risk of some species even being considered for state or federal listing as threatened or endangered.
- Older aspen (50+), with a significant conifer component, is critical for winter deer and moose habitat. Stands aged 40-50 years old do not develop a balsam fir component by age 50. This level of harvest in the aspen covertype will eliminate critical habitat for deer, moose, fisher, marten, and many other wildlife species on WMAs that are dependent on older forest for all or part of their life cycle and habitat needs. For example, in most cases, the 60-year-old rotation age will not allow the development of aspen (or other) trees with diameters large enough for fisher and marten denning per DNR research.

- EWR MBS staff believe that Boreal Owls may already have been extirpated from northern MN because of timber harvest on public lands, and it is unfortunate to think we may be pushing additional species to the brink on the very areas that should be serving as refugia.
- This will have long-term negative impacts to already declining populations and may have substantial implications for federal aid reimbursement on our WMAs (as recognized in the FAW Directive 070205 for Forest Management on WMAs and AMA/FMAs).
- The STHA failed to adequately address spatial concerns for wildlife habitat. For example, area-sensitive species need large areas, not small clumps of dispersed wildlife habitat fragments (which collectively add up to the 2.5% older than age 60). As a result, the cord target for "wildlife goals" was likely overly optimistic. Making our suggested changes to the STHA implementation will help rectify this problem.
- We believe our suggestions can be practically implemented and are consistent with our DNR mission. We also note that even if all our suggestions were to be adopted, it represents only a minor mitigation to our larger concerns, and as such, we do not feel our ideas are 'excessive' in any way.
- STHA will determine habitat conditions on forested WMAs/AMAs as a byproduct of extraction. Managing for desired fish and wildlife habitat conditions should be a higher priority on WMAs and AMAs.