Chapter 6. Response to Public Comments from *Preliminary Issues and Assessment document*

6.1 Background

A public comment period on the *Preliminary Issues and Assessment Document* was initiated in late September 2006 and ended October 14, 2006. Comments were accepted via letter, e-mail, or fax (a list of individuals and organizations that submitted comments is found at the end of this chapter). The comments submitted were grouped into common topics and issues with responses provided. The DNR response prepared by the SFRMP Team in this chapter provides a reference to the General Direction Statement (GDS), Strategies; Cover Type Management Recommendations, or other sections where the comments relating to the topic or issue were considered in the CP-PMOP Plan.

6.2 Issue Specific Comments

Issue from the *Preliminary Issues and Assessment document:*
How should the age-classes of forest types be represented across the landscape?

Comments Received:
1. *Age-class distributions should focus on balancing age-classes to improve forest productivity and health and reduce mortality*
2. *Recognize the ecological importance of the Lake States region for providing early successional deciduous forests within the larger landscapes.*

Response:
It is a goal of the CP-PMOP plan to work toward balancing the age-class distribution of all stands managed on an even-age basis. The plan considers the importance of early successional forests by establishing rotation ages that will lower the average harvest age and by designating young patches where harvests will be coordinated to maintain areas of young forest.

Representative GDS:

A3a. Forests managed for young, early-successional stages will be distributed across the landscape.

Representative Strategies:

14. Consider ECS characteristics when locating sites capable of supporting young early-successional forests.

15. Move aspen, balm of Gilead, paper birch, and jack pine cover types toward a balanced age-class structure.

18. Include areas of young, early-successional forest, adjacent to areas of extensive or expansive old forest (i.e. ERF, old growth, or OFMC).

19. Maintain young, early-successional forest, in a variety of patch sizes to provide habitat for associated species.

122. Move even-age managed cover types toward a balanced age-class structure.

Issue from the *Preliminary Issues and Assessment document*:
In your opinion, what are appropriate mixes of vegetation composition, structure, spatial arrangement, growth stages, and plant community distribution on state lands across the landscape?

Comments Received:

1. *Need to clarify the significance of the relative tree species abundance as depicted in Chapter 3 (of the Preliminary Issues and Assessment Document). Is this based on acres?*

Response:

The species abundance information in Chapter 3 is not based on acreage. It is a reflection of historical tree frequency based on notes made by original land surveyors from 1846-1908 as they selected bearing trees. From 1977-2002, a bearing tree selection method, developed by Dr. John Almendinger, has been applied to forest inventory plot information. The impact of agricultural and residential development is not measured. The relative occurrence of certain tree species in forested areas is the focus. Historical information, such as through bearing tree notes is a primary factor used to help determine the historical landscape. Several goals of this plan are to consider and move forest composition to more closely reflect the vegetation that developed under natural disturbance regimes.

Representative GDS:

B1a: Forest composition will be managed according to ecological classifications to more closely reflect vegetation that developed under natural disturbance regimes.

Representative Strategies:

20. Consider the MFRC North Central Landscape Plan forest composition goals and objectives**.**

21. Increase mixed forest conditions in most stands in selected cover types.

22. Decrease the acres of aspen, northern hardwoods, oak, ash, and lowland hardwoods to favor conifer cover types.

23. Increase the acres of the white pine, jack pine, tamarack and northern white cedar cover types.

24. Increase the acres of the cedar and tamarack cover types on both upland and lowland sites.

Issue from the *Preliminary Issues and Assessment document*:

How can we address the impacts of forest management on riparian and aquatic areas?

Comments Received:

1. *DNR should follow MFRC site level guidelines, not exceed them*.

Response:

It is DNR policy to adhere to the *MFRC Site-Level Guidelines* when implementing all forest management practices. Specific MFRC Guidelines will be implemented, appropriate to the field circumstances, on a site-by-site basis.

Representative GDS:

C2a. Management activities will protect or enhance riparian areas.

Representative Strategies:

43. Implement the MFRC *Voluntary Site-level Forest Management Guidelines*.

48. Establish widths of RMZs consistent with MFRC *Voluntary Site-level Forest Management Guidelines*.

49. Field identify the boundaries of RMZs prior to applying treatments.

50. Maintain a filter strip between aquatic resources and treatment areas consistent with MFRC *Voluntary Site-level Forest Management Guidelines*.

51. Implement treatments within identified RMZs consistent with MFRC *Voluntary Site-level Forest Management Guidelines.*

Issue from the *Preliminary Issues and Assessment document*:
How can DNR develop new forest management access routes that minimize damage to other forest resources?

Comments Received:
1. *Provide access to private lands as well as other public lands for timber management purposes.*
2. *Identify and maintain forest roads that are needed for resource management and protection.*
3. *Road closures should be carefully reviewed*.
4. *Do not obliterate roads*.

Response:
One task of the SFRMP planning process is to identify the amount and type of access needed to treat the stands identified on the 10-year stand exam lists. The SFRMP planning process is primarily intended to identify new access needs and is not intended to develop a management plan for these accesses. Management of forest access is planned for through other programs within DNR including the DNR road management program and off-highway vehicle (OHV) planning process. Coordination in establishing, using and maintaining forest management access with other landowners, both public and private, is a goal and strategy of this plan. The DNR has no ability to manage or provide access to private lands. It is DNR policy to allow access across DNR lands when appropriate. DNR makes every effort to plan for and coordinate forest access routes. The new access needs lists component of this plan identifies needed access over the next 10-year plan implementation period. This new access needs list identifies, when practical, the type and recommended disposition of new access needed to manage isolated state lands.

Pressures exist to not expand the amount of maintained access on state forest land due to maintenance costs to reasonably safe standards. Isolated routes or routes that are not regularly maintained are frequently abused, resulting in erosion and reduced suitability for the intended purpose. Consequently, as needed, access restriction is appropriate to protect natural resources and the viability of the access route for future management. Frequently, gating or berming to restrict unwarranted vehicle use is the preferred option. In rare cases, access routes may be blocked with slash or debris to reduce further damage and then reopened in the future for timber management purposes.

Representative GDS:

D1a. Forest access routes will be well planned, with an increased level of collaboration among federal, county, private, and local units of government to share access, minimize new construction and close routes no longer needed for forest management purposes**.**

Representative Strategies:

68. Complete a timber access plan.

69. As Annual Stand Exam Lists are prepared continue to cooperate with other forest landowners to retain existing access to state land and to coordinate development and maintenance of new access routes across mixed ownerships.

71. Gate, barricade or obliterate all roads constructed during the life of this plan that are not needed for future stand management.

Issue from the *Preliminary Issues and Assessment document*:
How might we maintain or enhance biodiversity, native plant community composition, and retain within-stand structural complexity on actively managed stands where natural succession pathways are cut short?

1. *Only use the Range of Natural Variation as a tool and not as a goal.*

   Response:
   This Plan recommends that the range of natural variation (RNV) be used as a tool. This is evidenced by the strategy stated below which states that RNV should be "considered" when stand treatments are implemented. RNV information on forest composition and age-structure developed for the CP and PMOP subsections were used as a tool for identifying potential composition change goals. The goal is not to recreate a specific historic condition. Analysis of RNV, including many other considerations, was used to determine the magnitude and location of forest cover type composition change goals in the subsections.

   Representative Strategy:
   12. Consider ECS and range of natural variation (RNV) when identifying sites capable of growing older stands and/or providing winter cover and food sources for wildlife.

2. *It is important that social and economic values are considered and balanced with ecological values.*

   Response:
   This plan attempts to balance social and economic values with ecological values. One primary objective of the SFRMP process is to maintain the DNR's certification as sustainable forests. To maintain sustainable economic conditions, a sustainable resource is necessary. Social and economic values are furthered by maintaining forest certification on DNR managed lands.

   Representative GDSs:
   H1a. Forests will be managed to provide a sustainable supply of forest products for human use, while minimizing negative impacts to wildlife habitat and forest biodiversity.

   I1a. Forests will be managed to increase overall timber productivity.

   L1a. Forest management activities will protect cultural resources on state administered lands.

   Representative Strategies:
   122. Move even-age managed cover types toward a balanced age-class structure.

   124. Improve the distribution of ages and quality of timber in uneven-aged managed cover types.

   136. Support research that maximizes timber productivity (e.g., optimal stocking levels, mixed species management, treatment timing) without impacting wildlife and plant species.

   137. Apply management techniques to improve stocking and stand composition on general forestry lands

Issue from the *Preliminary Issues and Assessment document*:
How might we provide habitat for all wildlife and plant species and maintain opportunities for hunting, trapping, and nature observation?

Comments Received:
1. *Provide specific measures of public interest in individual species*.

2. *Population goals for species of economic importance such as ruffed grouse or whitetail deer should be developed*.

   Response:
   Establishing specific measures of interest in wildlife species and identification of desirable or undesirable wildlife species and population levels is beyond the scope of this plan. The Management Section of Wildlife is responsible for providing goals and policy relative to wildlife populations.

   The primary objective of this plan is to manage vegetation while accommodating the multiple use-challenge of the DNR. This includes managing vegetation while considering impacts to wildlife habitat and populations. In this regard, vegetation management, as it affects wildlife populations is one of many primary considerations used to guide vegetation management as recommended in this plan. Wildlife management and establishing population goals for specific species are prepared by the Management Section of Wildlife. For example in 2008, the section anticipates adopting a *Ruffed Grouse Long-Range Plan* that will, among other recommendations, identify desired annual average harvest goals. As those plans/guidelines and management directions are prepared and adopted, they become the section's input and recommendations relating to vegetation management as implemented on state forest lands.

Issue from the *Preliminary Issues and Assessment document*:
How might we address the impacts on forest ecosystems from forest insects and disease, invasive species, animal damage, global climate change, and natural disturbances such as fires and blow down?

Comments Received:

1. *Age-class distributions should focus on balancing age-classes to improve forest productivity and health and reduce mortality.*

   Response:
   It is a goal of this plan to work toward balancing the age-class distribution of all stands managed on an even-aged basis. Based on the existing age-class balance of the commercial species, as they currently exist, this can be achieved in some species, but cannot be achieve in other species during the 50-year planning horizon of this plan. As harvest levels and cover type management recommendations were prepared (see Chapter 4) a primary goal was to balance the age-class distribution of even-aged cover types within the 50-year planning horizon. In addition, the plan takes a pro-active approach by establishing rotation and maximum ages that consider forest health and productivity.

   Representative GDSs:

   A1a. Forest resources will continue to represent multiple age-classes, distributed across the landscape**.**

   N1a. Forest management will minimize damage to forests from native insects and diseases.

   Representative Strategies:

   2. Provide representations of desired age-classes through forest composition goals.

   3. Develop and apply criteria to identify stands that are over rotation age but can be carried into subsequent 10-year planning periods to reduce age-class imbalances.

   97. Provide a balanced age-class structure in cover types managed with even-aged silvicultural systems.

   150. Manage identified forest insect and disease occurrences to contain and reduce impacts, using techniques appropriate for the species involved.

152. Manage the vegetative content and structure of stands to reduce the potential impact of insects and disease.

Issue from the *Preliminary Issues and Assessment document*:
What are sustainable levels of harvest for timber and non-timber forest products?

Comments Received:

1. *Need to demonstrate that we are managing in a sustainable manner.*

Response:

A primary goal of the SFRMP process is to implement forest management while considering broad ecological characteristics, which affect vegetative management. Vegetative management characteristics include ecological, wildlife and cultural factors as well as characteristics, that directly affect and determine timber production levels. As these broad characteristics are factored into vegetation management actions, sustainable forests will result. An equally important result of maintaining sustainable forests is that certification by national independent forest certifiers is achieved. DNR's forest lands are presently certified as sustainable forests, but continued planning and completion of the CP-PMOP Plan, and other SFRMPs is necessary to maintain this certification.

Representative GDSs: **H1a**. Forests will be managed to provide a sustainable supply of forest products for human use while minimizing negative impacts to wildlife habitat and forest biodiversity.

M1a. Forest management will continue to implement measures to sustain or enhance existing biodiversity.

Representative Strategies:

142. Ensure that DNR forest managers have access to and consider appropriate related resource management policy, guidelines and plans of other divisions when vegetative management is prescribed.

147. Complete the Minnesota County Biological Survey (MCBS) for all counties within the subsections.

148. Maintain the ecological integrity of Native Plant Communities (NPCs) by documenting and managing known locations with a statewide rank of Critically Imperiled (S1) or Imperiled (S2), and those with S-ranks of S3 to S5 that are rare or otherwise unique in these subsections.

149. Consult the Natural Heritage database (including the rare features database) prior to prescribing or implementing forest management activities.

Issue from the *Preliminary Issues and Assessment document*:
How can we increase the quantity and quality of timber products on state lands?

Comments Received:

1. *ERF ages should not exceed 1.5 times the normal rotation age. Exceeding these ages would significantly reduce timber outputs.*

Response:

The amount of old forest and ERF on state lands is determined based on department policy found in the DNR *Extended Rotation Forest (ERF) Guidelines, July 1994* (See *CP-PMOP Preliminary Issues and Assessment Document).* This ERF policy evaluated and identified the optimum normal and extended rotation ages for all commercial cover types that allowed the multiple use challenge to be accommodated on state forestlands. The *ERF Guidelines* identify that selective harvest or deferring the ultimate harvest of the trees or stand can provide for larger products such as sawlogs or enable an understory to become merchantable (e.g., balsam fir in an aspen stand) by allowing it to grow past the traditional rotation ages of the overstory species. In applying the

ERF policy, several CP-PMOP Plan Strategies identify that ERF should be prescribed in areas where old forest attributes can address multiple goals. In most cover types in the CP-PMOP subsections, the ERF ages do not exceed 1.5 times the normal rotation age.

Representative GDS

A2a: Forest managed for old forest characteristics will be distributed across the landscape.

Representative Strategies:

11. Prescribe ERF stands in steep areas, inaccessible terrain, riparian areas, habitat areas, travel corridors, and visual corridors to achieve desired old forest attributes consistent with DNR OFMC policy.

2. *Short-term harvest rates should be increased to capture mortality*.

Response:

Normal rotation ages have been developed for all commercial species and serves as a primary factor in establishing harvest levels. When species do not attain their normal rotation age due to insects, disease or disturbance events, efforts will be made to salvage timber from damaged stands as appropriate.

Representative GDS

N3a: Natural disturbance events will be evaluated to determine the appropriate forest management response to address the effects on the landscape.

Representative Strategies:

152. Manage the vegetative content and structure of stands to reduce the potential impact of insects and disease.

156. Accept a higher level of disturbance in ERF stands, provided the level of impact does not jeopardize the ability to regenerate the stand to the desired cover type or jeopardize the management goals of surrounding stands.

157. Evaluate large-scale (i.e., hundreds to thousands of acres) and small-scale (i.e., tens of acres) disturbance events to determine appropriate action

158: Implement efforts to salvage usable timber stumpage from damaged stands in a timely manner to minimize losses due to decay and staining.

3. *Implement a proactive approach to improve forest health and productivity*.

Response:

The SFRMP process is designed as a proactive approach to forest vegetative management. The CP-PMOP Plan contains 31GDSs and 168 strategies, all of which state a proactive approach to improving forest health and maintaining forest productivity while reflecting the broad multiply use mandate for DNR forest lands.

Representative GDSs:

A1a. Forest resources will continue to represent multiple age-classes, distributed across the landscape.

A3a. Forests managed for young, early-successional stages will be distributed across the landscape.

H1a. Forests will be managed to provide a sustainable supply of forest products for human use while minimizing negative impacts to wildlife habitat and forest biodiversity.

I1a. Forests will be managed to increase overall timber productivity.

N1a. Forest management will minimize damage to forests from native insects and diseases.

Representative Strategies:

72. Maintain the highest soil productivity possible by favoring regeneration and growth of native vegetation and trees using the *MFRC Voluntary Site-level Forest Management Guidelines.*

73. Utilize harvest systems, methods and sale regulations (e.g., process at stump) that protect advanced regeneration and maintain or improve the patterns, diversity and composition of forest vegetation present in the stand prior to harvest.

122. Move even-age managed cover types toward a balanced age-class structure.

124. Improve the distribution of ages and quality of timber in uneven-age managed cover types.

136. Support research that maximizes timber productivity (e.g., optimal stocking levels, mixed species management, treatment timing) without impacting wildlife and plant species.

137. Apply management techniques to improve stocking and stand composition on general forestry lands.

152. Manage the vegetative content and structure of stands to reduce the potential impact of insects and disease.

4. *Consider stands of aspen, paper birch, and white spruce greater than 70 for harvest over the next five years.*
5. *Aspen, paper birch, and white spruce beyond the age of 50 should be harvested and regenerated prior to experiencing additional volume losses.*

Response:

The SFRMP process requires many factors to be considered in establishing cover type treatment levels. These factors include: providing for a balanced age-class distribution for even-aged managed cover types; providing for old forest characteristics; providing extended rotation forests; and considering the impacts of natural disturbances and disease. These factors are accommodated and considered as harvest levels are established. Further guidance is provided by establishing normal rotation ages and maximum rotation ages for all commercial species and is one of the primary management factors in establishing harvest levels by cover type. Across the two subsections, normal rotation ages for aspen are 45 and 40 years; rotation ages for birch are 50 years and rotation age for white spruce is 50 and 60 years. Except those stands identified as ERF, old growth or EILC, all stands greater than these normal rotations ages have been considered for stand site visit and possible treatment.

In addition, see Chapter 4, Cover Type Management Recommendations for more detailed information concerning management of aspen, paper birch and white spruce in the CP and PMOP subsections.

Representative GDSs:

H1a. Forests will be managed to provide a sustainable supply of forest products for human use while minimizing negative impacts to wildlife habitat and forest biodiversity.

N3a. Natural disturbance events will be evaluated to determine the appropriate forest management response to address the effects on the landscape.

Representative Strategies:

122. Move even-age managed cover types toward a balanced age-class structure.

137. Apply management techniques to improve stocking and stand composition on general forestry lands.

158. Implement efforts to salvage usable timber stumpage from damaged stands in a timely manner to minimize losses due to decay and staining.

6. *Balsam fir and jack pine should be managed on a 50-year rotation and all stands greater than 60 years old harvested during the next 10-years. Stands older than 60 are highly susceptible to budworm and red rot*.
7. *Depart from sustainable flow to capture mortality and volume losses that are presently occurring on state lands.*

Response:

Normal rotation ages and merchantable ages have been developed for all commercial species and serve as one primary management factor in establishing harvest levels. Normal rotation ages consider the mean annual increment and other available data related to forest productivity considering wood quality and local knowledge. Normal rotation ages have been established specifically for the CP and PMOP landscapes to consider a range of factors that affect vegetation growth. When disturbance events occur before normal rotation ages are achieved, the CP-PMOP Plan recommends that efforts be made to salvage this timber.

Considering balsam fir and jack pine, the normal rotation age is 45 and 40 years respectively (younger than recommended by the commentator) and the maximum rotation age for these two cover types is 60 and 65 years (consistent with the recommendations of the commentator).

In addition, see Chapter 4, Cover Type Management Recommendations for more detailed information concerning management of, balsam fir and jack pine in the CP and PMOP subsections.

Representative GDSs:

H1a. Forests will be managed to provide a sustainable supply of forest products for human use while minimizing negative impacts to wildlife habitat and forest biodiversity.

N3a. Natural disturbance events will be evaluated to determine the appropriate forest management response to address the effects on the landscape.

Representative Strategies:

156. Accept a higher level of disturbance in ERF stands, provided the level of impact does not jeopardize the ability to regenerate the stand to the desired cover type or jeopardize the management goals of surrounding stands.

157. Evaluate large-scale (i.e., hundreds to thousands of acres) and small-scale (i.e., tens of acres) disturbance events to determine appropriate action.

158. Implement efforts to salvage usable timber stumpage from damaged stands in a timely manner to minimize losses due to decay and staining.

8. *Strive to increase productivity of commercial timberlands.*
9. *Identify site productivity classes across the forests and prioritize the most productive sites for management.*

Response:

Within the broad multiple use challenge embraced by DNR, increased productivity of commercial timberlands is a primary objective.

Representative GDS:

I1a. Forests will be managed to increase overall timber productivity.

Representative Strategies:

110. Use harvest systems, and sale regulations that protect advanced regeneration and maintain or improve patterns, diversity and composition of forest vegetation representative of the stand prior to harvest.

136. Support research that maximizes timber productivity (e.g., optimal stocking levels, mixed species management, treatment timing) without impacting wildlife and plant species.

137. Apply management techniques to improve stocking and stand composition on general forestry lands

159. Expand the knowledge of field staff related to preventing or reducing damage caused by wildlife through training and/or field level information sharing.

10. *Recognize and assess forest growth potential and propose intensive forest management programs to increase the productivity on timberlands*.
11. *Assess stocking levels, current growth, and the capacity of these lands to increase growth per acre*.
12. *Matching site to species and regeneration to full stocking levels should be encouraged, post harvest, to increase productivity.*

Response:

The capacity of lands to increase growth per acre can be achieved, in part, by ensuring that tree species suitable to the site are identified and managed as the priority species. A primary component of the CP-PMOP Plan is to identify forest vegetative management practices that consider the ecological characteristics of the site. Forest stand characteristics such as site index, topography, hydrologic considerations and soils capabilities are all factors that determine forest growth potentials. Matching vegetative management practices consistent with the site's ecological characteristics is a recurring theme is the plan's strategies. Increasing and improving forest growth potentials or timber productivity is stated in many strategies throughout this plan. See Chapter 4, *Cover Type Management Recommendations* for specific references to tree species and the native plant communities where the species is identified as good competitors and where cover type changes are recommended based on NPC. In addition see Appendix E, *Silviculture Prescription Worksheet* that outlines the role that NPCs will play as site level management objectives and prescriptions are implemented by foresters.

Representative GDSs:

A1a. Forest resources will continue to represent multiple age-classes, distributed across the landscape.

H1a. Forests will be managed to provide a sustainable supply of forest products for human use while minimizing negative impacts to wildlife habitat and forest biodiversity.

I1a. Forests will be managed to increase overall timber productivity.

Representative Strategies:

1. Consider ECS characteristics and other indicators when deciding where old forest and younger age-classes are best suited.

12. Consider ECS and range of natural variation (RNV) when identifying sites capable of growing older stands and/or providing winter cover and food sources for wildlife.

14. Consider ECS characteristics when locating sites capable of supporting young early-successional forests.

37. Utilize ECS information to assist in determining management direction for stands on state lands.

85. Ensure that regenerating tree species are suitable as indicated in the DNR's ECS *Suitability of Tree Species by Native Plant Community* tables

97. Provide a balanced age-class structure in cover types managed with even-aged silvicultural systems.

98. Increase the productivity and maintain the health of even-aged cover types.

102. Maintain the productivity of forest soils to favor regeneration and growth of native vegetation and trees.

136. Support research that maximizes timber productivity (e.g., optimal stocking levels, mixed species management, treatment timing) without impacting wildlife and plant species.

137. Apply management techniques to improve stocking and stand composition on general forestry lands.

13. *Identify off-site aspen (site indices < 50) for conversion. Conversion of these stands should be through active not passive management*.

Response:
The DFFC for the aspen cover type identifies that over the next 50 years a total of 14,369 acres are to be actively identified and converted to white cedar, jack pine, white spruce, white pine, or red pine. The stands of aspen cover type determined to be most suitable for conversion have been identified and included in the conversion pool. From this conversion management pool the Forestry Area Stand Exam Lists have identified specific aspen stands for cover type changes and or site visits over the 10-year plan implementation period.

Representative GDS:
B1a. Forest composition will be managed according to ecological classifications to more closely reflect vegetation that developed under natural disturbance regimes.

Representative Strategy:
22. Decrease the acres of aspen, northern hardwoods, oak, ash, and lowland hardwoods to favor conifer cover types.

14. *Develop high-risk-low-volume (HRLV) stand criteria to be implemented over the next five years.* (MFI)

Response: The CP and PMOP subsections do not contain significant HRLV stands, as may be found in other subsections of the state. Factors that tend to lead to HRLV stands (limited access and significant topography) are generally not found in the CP-PMOP. Relatively comprehensive access, reasonable topography and reasonably stable markets have combined to reduce possible HRLV stands to relatively minor acreages. In the CP-PMOP the majority of what could be considered high-risk stands is due to advanced age and as such have been included in the management pool from which the 10-year Stand Exam Lists were developed. For these reasons special management or identification of HRLV was not considered a significant factor in the CP-PMOP planning process.

15. *School Fund Trust Lands should be managed to increase timber growth and productivity and to maximize the return to the trust. These lands should not be reserved from timber management.*

Response:

The management goal for school trust lands is to secure the maximum long-term economic return consistent with sound natural resource and management principles. Sound natural resource management principles have been interpreted as managing trust lands to preserve unique characteristics or values, and to provide recreation opportunities. The DNR has been charged with managing school trust lands. The Forest Resources Management Act of 1995 requires, as policy, that the DNR pursue the sustainable management, use, and protection of the state's forest resources. In implementing these two broad directives, the DNR manages school trust lands through a balance of long-term economic return, providing wildlife habitat, recreational opportunities, protection of unique characteristics, and other environmental and social goals.

16. *Do not remove timberland from production via high biodiversity areas, ecologically important lowland conifers, misapplication of ERF or allowing stands to succeed naturally*.

Response:

A primary challenge of the DNR and intent of the SFRMP process is to provide for vegetative management while reflecting the needs of all forest users including those with interests in high biodiversity areas, EILC and ERF. It is not the intent to remove timberland from production, but rather to accommodate all users and forest goals while enhancing timber productivity where possible. Identification of biodiversity areas is a function of the Minnesota County Biological Survey. The intent is to identify areas of outstanding, rare and unique resources that should be considered as vegetative management is implemented. EILCs have been identified as a result of a comprehensive effort to identify those stands that met specific designation criteria. Identification of ERF is governed by statewide policy and standards applied to the specific characteristics of the CP and PMOP subsections. The DNR is challenged to accommodate all of these interests as forestry management is practiced.

The direction presented for forest resource management in these subsections is consistent with strategic direction previously developed by the Department, e.g., *Directions 2000, The Strategic Plan*, *September 2000*, and more recently, *A Strategic Conservation Agenda 2003-2007*. These documents and policy directions can be viewed on the DNR Web site at: http://www.dnr.state.mn.us/aboutdnr/reports/index.html**.**

Representative GDSs:

H1a. Forests will be managed to provide a sustainable supply of forest products for human use, while minimizing negative impacts to wildlife habitat and forest biodiversity.

I1a. Forests will be managed to increase overall timber productivity.

Representative Strategies:

4. Designate ERF stands in the amounts and percentages prescribed by the Statewide ERF Work Group.

11. Prescribe ERF stands in steep areas, inaccessible terrain, riparian areas, habitat areas, travel corridors, and visual corridors to achieve desired old forest attributes consistent with DNR OFMC policy.

125. Designate lowland conifer old growth from EILC stands and return undesignated stands to the harvest pool.

137. Apply management techniques to improve stocking and stand composition on general forestry lands

Issue from the *Preliminary Issues and Assessment document*:

How can we implement forest management activities and minimize impacts on visual quality?

-No comments received.

Issue from the *Preliminary Issues and Assessment document*:
How will foresters and wildlife managers achieve desired results and maintain the integrity of state and federal statutes?

Comments Received:

1. *Need to foster more cooperation between land managers on projects*.
2. *Continue to solicit comments from and support of other forest owners and managers*.

Response:

Fostering cooperation and soliciting comments from other forest managers has been implemented in the past and will be maintained and improved through the SFRMP process. Cooperation is being addressed through multi-divisional planning within the department and local contacts with federal, county and industrial land managers. In particular, CP-PMOP Preliminary Issues and Assessment Document, the CP-PMOP Plan, the 10-year Stand Exam Lists, and the New Access Needs Lists will be made available to other agencies managing forest lands in these subsections, stakeholders and the public. Currently, the DNR notifies other agencies when the annual harvest plans and annual plan additions are posted on the DNR Web site for review. In addition DNR staff participants in the MFRC North Central Regional Landscape planning process. The MFRC Plan produced landscape level direction for agencies and other landowners and recommended strategies that implement the MFRC landscape direction.

Representative GDS:

K1a. Forest management activities will continue to adhere to state and federal statutes.

Representative Strategies:

20. Consider the MFRC *North Central Landscape Region Plan* forest composition goals and objectives.

30. Coordinate plan implementation with large land managers including the U.S. Forest Service, county land departments, local governments, industrial forest land managers and nonprofit organizations to identify causes and mitigate impacts of fragmentation.

119. Develop cooperative procedures with other land management agencies to coordinate wildlife management efforts.

140. Invite comment from, and coordinate with adjacent landowners.

141. Ensure that forest resource managers maintain a working knowledge of all applicable state and federal statutes, rules, guidelines and policies.

142. Ensure that DNR forest managers have access to and consider appropriate related resource management policy, guidelines and plans of other divisions when vegetative management is prescribed.

144. Share data on known cultural sites and consider impacts to these sites as silvicultural treatments are applied.

Issue from the *Preliminary Issues and Assessment document*:
How will cultural resources be protected during forest management activities on state administered lands?

-No comments received.

Issue from the *Preliminary Issues and Assessment document*:
How can we ensure that rare plants and animals, their habitats, and other rare features are protected in these subsections?

-No comments received

6.3 General Comments on the *Preliminary Issues and Assessment* document

Identified below are comments received, which were not considered directly related to any particular Issue as contained in the *Preliminary Issues and Assessment document*.

Comment Received:

1. *Need to demonstrate that our land managers are using the best science available*.
2. *Incorporate the forest modeling software from this point forward regarding the Chippewa Plains SFRMP*.

   Response:

   DNR is adopting new tools, techniques and procedures on a regular basis aimed at remaining current with state-of-the-art resource management strategies. The divisions are charged with keeping abreast of changing forest conditions, markets, ecological and wildlife trends and challenges. Information sharing and cooperative planning among divisions and with other resource / scientific institutions is encouraged and practiced. Examples of changing forestry management techniques include: revisions to the basic forest stand database, efforts to incorporate new data bases into forestry management such as the County Biological Survey; considering the Native Plant Community classification on sites that are potential forest development projects; cooperative agreements with research institutions, and efforts to incorporate state-of-the-art forest modeling software to predict affects of various forest management actions.

   Representative GDS:

   N5a. Forest management practices will consider the impacts of climate change on forest lands and will attempt to mitigate these impacts using current knowledge and future research findings.

   Representative Strategies:

   12. Consider ECS and range of natural variation (RNV) when identifying sites capable of growing older stands and/or providing winter cover and food sources for wildlife.

   55. Collect baseline ecological data on surface water quality across the subsection.

   81. Design and implement training that allows field staff to identify native plant communities, growth stages, natural disturbance intervals, suitable tree species, and soil operability ratings.

3. *The Assessment does a good job of presenting the important elements relating to forest vegetation management on state-administered forest lands*.
4. *Need to focus less effort on planning and more on implementation*.

   Response:

   Forests are complex systems that require significant information for accurate description. The SFRMP planning process requires an extensive range of information as depicted in the CP-PMOP *Preliminary Issues and Assessment* document to accurately establish background information and forest management challenges reflecting the broadest interests. It also commits to public review and comment at two key stages in the process, issue identification and plan review.

The DNR has committed to completing subsection-based management planning as soon as possible to maintain forest certification on state forest lands. The DNR maintains that comprehensive forest land management is best achieved when practices are integrated and coordinated among common subsections. Considering that the CP-PMOP SDD includes 50 year DFFCs meaning that forest management policy and practices are being developed which have a 50-year implementation horizon, a thoughtful planning process is appropriate.

In addition, the Division of Forestry has been upgrading electronic inventory and silvicultural tracking systems to help coordinate and speed up implementation of plan strategies. Also, new processes for evaluating forest sites (i.e., Ecological Classification, Land Type Associations, etc.) as well as methods for projecting impacts of decisions (i.e. modeling) are being used to make the strategies developed during this planning process the most integrated and coordinated to date. Future forest management efforts will include continued improvements in data management, inventory, site characteristic recording and forest modeling.

6.4 Comments considered beyond the scope of this plan:

Comment Received:

1. *Need an effective education program*

   Response:

   Many strategies are identified that stress the importance of training and education to allow DNR professionals to stay current with changing and improved forestry management techniques. Public education is an important issue but outside the scope of this planning process. In an effort to produce plans in a timely manner, consideration has been narrowed to vegetative management on forested lands administered by the DNR Division of Forestry and Division of Wildlife.

6.5 List of organizations and individuals that submitted Comments

The following individuals / organizations have submitted comments on *Preliminary Issues and Assessment document:*

1. Bill Haugen
2. Tim J. O'Hara, Minnesota Forest Industries
3. Jim Mohler
4. Anne Oldakowski