

Chapter 5: Public Comments on Preliminary Issues and Assessment

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5.1 Background

A public comment period on the *Preliminary Issues and Assessment* document was initiated in (September 28, 2007) and ended (October 31, 2007). Comments were accepted via letter, e-mail, or fax (a list of individuals and organizations that submitted comments can be found at the end of this chapter).

The comments submitted were summarized and grouped into common topics and issues. They were not edited. In contrast with past SFRMP planning efforts, specific responses to comments were not developed as part of a planning process effort to reduce time spent developing plans. Comments were read and considered by subsection team members during work on General Direction Statements (GDSs), Strategies, Cover Type Management Recommendations, and Stand Selection.

5.2 Document and Process-Related Comments

1. The subsection planning process should be simplified for the benefit of DNR staff and interested stakeholders. Reviewers have a significant amount of material to read through.
2. The use of bearing tree survey information to estimate historical forest composition doesn't work. Bearing tree choices were made based on ability to persist. They were not chosen to provide a representative sample of the forest. Management decisions should not be based on bearing tree information, and this section should be removed from the plan.

5.3 General Comments on the Preliminary Issues

1. Please include application of the Minnesota Forest Resources Council's (MN FRC) site level guidelines in the DNR response to issues F., L., and M.
2. It is critical that lands in these areas be managed in a manner that promotes economic growth, recreational opportunities, and forest health. Timber sold on these lands provides many direct and indirect jobs to the region as well as funding for the general fund and school districts.
3. The depressed forest products industry in Minnesota needs a strong supply of reasonably priced fiber to remain economically viable.
4. I am concerned about what I perceive as a deteriorating quality of our woodlands. I think a more active role for the logging industry is needed. Timber harvest levels in the area have decreased to a rate two thirds of what the GEIS on timber harvesting indicated

they should be, and mature/over mature timberlands now represent over 40 percent of area woodlands. Our timberlands should be managed to ensure there are few over mature timber stands, sufficient public access points for the public and forest protection crews, and to increase funding for the landowner.

5.4 Specific Comments and Responses by Issue

Issues from the *Preliminary Issues and Assessment* document:

How should the age classes of forest types be represented across the landscape?

1. Mature or over-mature aspen should be reduced by harvesting timber more aggressively—DNR should propose harvest of all stands greater than 60 years of age in the next ten years.
2. The SFRMP should apply the following ERF and normal rotation ages:

Forest Type	Extended Rotation Age	Normal Rotation Age
Aspen	60	40
Balm of Gilead	60	40
Balsam Fir	60	50
Black Spruce	120	90
Jack Pine	60	50
Lowland Hdwds/Ash	120	90
Northern Hardwoods	120	80
N. White Cedar	120	100
Paper Birch	60	40
Red Pine	120	80
Tamarack	120	90
White Pine	150	100
White Spruce	80	60

No more than 20 percent of timberlands should be managed to an extended rotation age, and all forestlands should be recognized as contributing to ERF goals.

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?

1. There appears to be a decision to convert the current landscape to pre-European conditions and to mimic natural disturbance patterns in management decisions. Diversity is important but can be accomplished by a variety of vegetative management strategies. Conversion to pre-European conditions should be removed as a goal.
2. The DNR should only use the Range of Natural Variation as a tool and not as a goal. Pre-settlement conditions are difficult to determine and are not necessary to maintain biological diversity. Social and economic values should be considered and balanced along with ecological values.
3. DNR should identify off-site aspen (site index < 50) for conversion, using active management. Conversion of good quality aspen sites is not an appropriate management direction.

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

1. This issue has been answered by the development of MN FRC site level guidelines. Your answer says that managers may want to exceed these guidelines. These guidelines are not a minimum standard, so a more appropriate choice of word than “exceed” would be “modify”—please change “exceed” to “modify.”
2. The DNR implies that MN FRC site level guidelines may not be adequate. We question this basis. The DNR should follow these guidelines and not exceed them.

How might we address the impacts on forest ecosystems from forest insects and disease, invasive species, nuisance animals, herbivory, global climate change, and natural disturbances such as fires and blowdowns?

1. Extended Rotation Forest (ERF) application increases the risk of insects and disease.
2. DNR should: consider all aspen, birch, and white spruce stands greater than 70 years of age for harvest in the next five years; manage balsam fir and jack pine on a 50 year rotation and harvest all stands greater than 60 years of age during the next ten years due to susceptibility to budworm and heart rot.

What are sustainable levels of harvest for timber and nontimber forest products?

1. The lands in these subsections should be managed to provide the highest sustainable timber harvest.
2. Forest certification and FRC Site level guidelines help safeguard against unsustainable harvest levels.
3. DNR could increase harvest levels to ca. 250,000+ cords annually, and should expand use of commercial thinning in aspen, red pine, and white spruce.
4. Using a timber planning model with DNR timberland data; ERF constrained to a 20 percent prescribed level; economic rotation ages used for normal rotation age; harvest of all aspen older than 70 years of age in the first decade; and scheduling of oldest stands first in aspen, we believe harvest levels in the planning area can be increased from an average of 191,000 cords to 266,090 – 312,600 cords annually for the next ten years. 29,700 cords of this total could come from thinning of aspen, red pine, and white spruce forest types. Similar harvest levels could occur for two more decades, after which a harvest level of approximately 200,000 cords could be sustained for two decades. Initial higher harvest levels would target stands above economic rotation age.

How can we increase the quantity and quality of the timber products on state lands?

1. DNR should develop a high risk/low volume (HRLV) stand criteria to be implemented in the first five years of the plan, and make an attempt to market all of them, allowing industry to determine marketability.
2. Intensive forest management programs should be developed to increase timber productivity on state lands. This may involve multiple entries over the life of a stand. Application of existing BMP’s would resolve any concerns regarding ecological objectives.
3. DNR should identify site productivity classes and use them to prioritize the most productive sites for management. Regeneration should occur to full stocking levels post harvest.

5.5 Other Issues Submitted – Addressed Elsewhere

1. Damage and mortality related to stands being carried to an over mature condition represents a significant loss of timber volume. This should be addressed in the plan through inclusion of strategies designed to reduce such loss.
2. Extended Rotation Forest (ERF) application wastes considerable volumes of useable wood fiber, decreasing the amount of revenue to the state general fund and school districts.
3. School trust fund lands should not be reserved from timber management. DNR should also assess the percentage of these lands that are managed as ERF or are considered high biodiversity areas or Ecologically Important Lowland Conifers (EILC), along with determining any loss of revenues to the trust from these designations.
4. We do not support categorical land exclusions that preclude or limit timber management on lands designated as timberland.
5. DNR should maximize timber productivity on their lands to increase revenue to rural school districts.
6. Total revenue potential from timber sales on the lands within the planning area can exceed \$5.3 million dollars, with \$4.2 million of that total on school trust lands. Applying U.S. Census of Manufactures data to this potential harvest level produces an estimated economic impact of \$216 million and 1,200 jobs annually.
7. Sustainably increasing timber outputs from state lands is critical to maintaining a viable forest products industry in Minnesota while generating substantial economic activity in rural parts of the state.

5.6 Other Issues Submitted – Beyond the Scope

1. The DNR must provide huntable populations of game species, and should recognize the importance of the Lake States region to early successional species. Population goals for species of economic importance such as ruffed grouse and white-tailed deer should be developed.
2. The DNR should provide access to private lands as well as other public lands for timber management purposes. Roads needed for future forest management or forest protection should be identified and maintained. Road closures should be reviewed carefully, and if closed they should not be completely obliterated.

5.7 List of Organizations and Individuals Who Submitted Comments

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

1. Steve Earley, Boise Cascade
2. Tim J. O’Hara, Minnesota Forest Industries
3. Nathan Heibel
4. Dan Klocek
5. Jim Marshall, UPM-Blandin Paper

6. Bruce Meade