

6. Public Comments on Preliminary Issues and Assessment

A two-week public comment period on the Preliminary Issues and Assessment document was held from November 15 through December 2, 2002. During the comment period, 30 documents with comments were submitted via letter, e-mail, or fax (a list of individuals and organizations that submitted comments is at the end of this chapter). The comments submitted within the documents were grouped into common topics and issues. Separate responses to each comment document have not been developed. The summary of comments included in this chapter attempt to show the range of comments received on a topic or issue, so duplicate comments or all the comments received may not have been included. Comments for or against a topic or issue were not tallied because the public review process was not intended to be a scientific poll or vote. 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 section where the comments relating to the topic or issue were considered in the plan. Based on the comments and further review of the preliminary issues by the SFRMP Team, three new issues were added and one preliminary issue was dropped because it was beyond the scope of the SFRMP process. Following are the summarized comments by topic or issue and the associated response developed by the SFRMP Team:

6.1 Document and Process Related Comments

Comments:

- *Alternative formats appreciated.*
- *Report too long. Include abstract or bulleted list of important topics.*
- *Include list of interdisciplinary team members-by title and/or name.*
- *MN-DNR's review process emulates federal forest review process (too lengthy, generates appeals and litigation, overanalyzes issues, inefficient, not timely).*
- *Two weeks is too short to review a 320-page document.*

Response:

- The process and content of the SFRMP plans was developed by a statewide DNR SFRMP Process Work Group in 1999. Since the SFRMP method of planning began, there have been a number of revisions to the process and content of the documents based on experience with the process and input from within the department and from stakeholders. The assessment content is intended to provide the information sufficient for public review and input on the assessment and preliminary issues for the subsection.
- The names and work locations of the interdisciplinary SFRMP Team members are included on Page iii.
- There are three opportunities for public review in the development of SFRMP plans, the first is a two-week period and the others are 30-day comment periods. A shorter time period for the initial review was used because the primary intent of the initial review period was to determine if there were any additional issues that the SFRMP Team should address in the plan. After strategic direction is provided in the plan, there are longer public review periods.

6.2 General Comments on the Preliminary Issues

Comments:

Support for

- *The ... supports the preliminary issues identified for these subsections*
- *Long-term (50-year) DFFC philosophy appreciated.*
- *Comprehensive. A good list. Well outlined.*
- *Document is thorough. What comes next? (more important)*

Public Input

- *Do what's best for the forest and inhabitants without giving in to interest groups and uninformed public opinion.*
- *Ask public to identify important forest issues, (in addition to "personal view of authors.")*
- *Preliminary issues section is inappropriate because each issue reflects divisional biases.*

Need literature citations

- *Preliminary issues section and assessment (tables) lack literature citations. Some themes include no supporting documentation.*
- *Statements are general, ambiguous, and appear biased. Literature citations would aid credibility.*
- *Internally-created preliminary issues affect how public can respond. Some issues (deer populations and effects) seem to be conjecture and need scientific support to avoid misunderstanding.*

Format/Apparent Biases

- *Report appears to be biased towards restoring forests to historic conditions (not possible, economically dangerous, anti-hunter) Biased against deer.*
- *Many issues deal with potential damage rather than actual damage.*
- *Answers to questions followed same format, that is, what would happen if issues were not addressed. Please add alternative ecologically sound management alternatives that public can comment on.*
- *My concerns don't necessarily fit the identified issues. My concerns require additional issues.*

Response:

- The preliminary issues presented in the initial document were based on issues identified in previous SFRMP plans that were also relevant in these subsections and additional issues unique to these subsections. The intent of the initial review was to determine if the team identified all the issues regarding vegetation management in these subsections.
- Additional information and citations are included in this Strategic Direction Document.
- 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 are on the DNR Web site at: <http://www.dnr.state.mn.us/aboutdnr/reports/index.html> .

- Three new issues have been added to the plan (A3, J, and K).

6.3 Comments and Responses by Issue

Issue A1: What are the desired age-class and growth stage distribution of types across the landscape?

Comments:

- *Need diversity in age structure*
 - *Too few lowland hardwoods less than 50 years old*
 - *Too few young oak stands*
 - *Too few young cedar (important winter browse for deer)*
 - *Too few young birch stands*
 - *Too many old aspen stands (disease issue? Too few clear-cuts to emulate historic fire events?)*
- *Please clarify desired age class distribution.*
- *Older forests have increased since 1989. Use GEIS mitigation strategy to balance age classes.*
- *Maintain diversity of young and old forests. Maintain early successional forest types (aspen, fir, jack pine, etc.) in suitable landscapes.*

Response: The issue and comments were primarily addressed in the following GDSs:

GDS-2A: Even-aged managed cover types will be managed to move toward a balanced age-class structure.

GDS-2B: ERF stands in even-aged managed cover types will be managed to achieve a declining age- class structure from the normal rotation age to the maximum rotation age.

GDS-2C: State lands include a representation of each of the growth stages that historically occurred in the ecosystems found in these three subsections.

Also, **Chapter 4**, Cover Type Management Recommendations, shows the current and desired age-class distribution for each of the cover types.

Issue A2. What are the appropriate amount, kind, and location of old forest?

Comments

- *Since old forest dominates the federal land in the subsections, DNR should offset this by focusing more on forest vigor, growth, health, and productivity.*
- *Some question as to wildlife needs for older forests.*
- *Report seems to be biased towards old forests.*
- *Should cooperate with other landowners to create large contiguous old, interior forests due to the increase in harvest levels since 1971.*
- *Old forest application should be through Extended Rotation Forest (ERF) management, and should be applied as suggested in the GEIS, with the intent of*

maintaining commercial forest land in production. Economic rather than biological rotation ages should be used in ERF calculations.

Response: The issue and comments were primarily addressed in the following GDSs:

GDS-1A: Old forest is distributed across the landscape.

GDS-4A: Adequate habitat and habitat components exist, simultaneously at multiple scales, to provide for nongame species found in these subsections.

GDS-4B: Adequate habitat and habitat elements exist, simultaneously at multiple scales, to provide for game species found in these subsections.

GDS-6: Timber productivity and quality on state timberlands is increased.

Strategies a, b, and g.

GDS-9A: The harvest level for each cover type results in harvest of non-ERF stands at normal rotation age, maintains the desired age-class structure, and maintains the health and timber quality of uneven-aged stands.

The amount of old forest on state lands is determined based on department policy found in the DNR Extended Rotation Forest (ERF) Guidelines. (See *Preliminary Issues and Assessment*, Page xvi.)

A description of the process used to help reach agreement on the desired levels of old forest in these subsections can be found in Appendix D, *Analysis of Old Forest Used to Determine the Desired Amount of Extended Rotation Forest*.

Issue A3 (added): What are the appropriate amount, kind and location of young, early successional forest?

Comments:

- *Maintain diversity of young and old forests. Maintain early successional forest types (aspen, fir, jack pine, etc.) in suitable landscapes*
- *Add question about young forests to offset old forests in question A2. Suggestion: “What are the appropriate amount, kind, and location of young (early succession) forest?”*
- *Northern Minnesota is a reservoir for early successional forests, which are declining in the East.*
- *There are too few young birch stands because there are too few fire management events.*
- *Young forests are important for biodiversity.*
 - *If early successional forests are not regenerated in a timely manner, then they are subject to:*
 - *Increase in woodpeckers, decrease in several game and songbird species*
 - *Loss of biodiversity and associated social, economic and ecological values.*
 - *Increased risk of insect infestation, disease, wildfire*
 - *Loss of forest productivity*

Response: The *added* issue and comments were primarily addressed in the following GDSs:

GDS-2D: Young, early successional forest is distributed across the landscape over time.

GDS-4A: Adequate habitat and habitat elements exist, simultaneously at multiple scales, to provide for game species found in these subsections.

GDS-4B: Adequate habitat and habitat elements exist, simultaneously at multiple scales, to provide for game species found in these subsections.

GDS-6: Timber productivity and quality on state timberlands is increased.

Also, **Chapter 4**, Cover Type Management Recommendations, includes information on the early successional forest types (aspen, balm of gilead, birch, and jack pine cover types).

Issue B1: What is the appropriate forest composition, structure, representation of growth stages, within-stand diversity, spatial arrangement of vegetative types, and native plant community distributions necessary to maintain sustainability goals for biodiversity, forest health, and productivity across the three subsections and how do we get there?

Comments:

- *Focus on ecosystem restoration, not just resource extraction. Use the best forest science. Include monitoring and evaluation. Use recovery plans for threatened, endangered, special concern species.*
- *List exotic species and native species of concern and quantify effects on forests.*
- *Forest health, resiliency, and sustainability are most important.*
 - *Use RNV to guide future ages and species composition.*
 - *Evaluation and monitoring is important.*
- *Work towards natural environment and range of natural variation.*
- *Do selective cuts. Then plant climax forest species and manage them to maturity.*
- *Practice site-based management (based on habitat type, use life-cycle approach)*
 - *If methods subdue natural processes, do not convert hardwoods to conifers.*
 - *Do not exceed established normal rotation guides (to prevent loss of fiber quantity and quality)*
- *No evidence that pre-settlement conditions increase biological diversity.*
 - *Consider social and economic values.*
- *Stand diversity increases after harvests. Show documentation.*
- *Tone of report assumes “pre-settlement” conditions are desirable; forests under current management are undesirable (aspen?) If SFRMP goal is pre-settlement conditions, then subsequent management will not favor aspen. Balancing old and young forests at the stand level are not founded on sound forest and wildlife management principles.*
- *Tone of report assumes biodiversity is all good without considering public recreation desires, economics, and social and visual considerations.*

- *Some natural systems are inherently simple. We need to manage high quality old and young stands on a site-based system. Sportsmen prefer more young forests.*
- *Why so negative against aspen and young forests? Lack of aspen affect populations of grouse, deer, moose, woodcock, and predators.*
- *Are today's forests truly less diverse than in the past? Were pre-settlement forests truly better than today's? Show documentation.*
- *You show no evidence that today's methods cause the demise of any creature or habitat type. Forest animals recovered after the intense logging era of the past.*
- *Restoring ecosystems needs to focus on needs of all life, not just how the forest affects humans.*
- *Manage toward a more natural range of variability (RNV) in our forest wildlife and vegetation species, a higher percent of conifer species, a larger percentage of older forest, protection of substantial old growth acres (managing for ERF may not be enough).*
- *RNV is a tool, not a goal. Factors exist today that didn't in pre-settlement times. Balance social and economic issues with ecological considerations. Omit value judgments.*
- *Designate logging areas and let nature take its course on the rest (no human impact).*
- *Return to pre-settlement conditions so that species can naturally reproduce indefinitely.*

Response: Range of natural variation (RNV) information on forest composition and age-structure developed for the Northern Superior Uplands Section was 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.

The issue and comments were primarily addressed in the following GDSs:

GDS-1B: Forest cover type composition on state lands moves closer to the range of cover type composition that historically occurred within the ecosystems found in these three subsections. Also, see Appendix G, *Process used to Determine Forest Composition Goals*.

GDS-1E: Management of state lands within MCBS sites of statewide biodiversity significance implements measures to sustain or minimize the loss to the biodiversity significance factors on which these MCBS sites were ranked.

Issue B2: How will we ensure restoration of important component tree species that have declined within forest communities within these subsections?

Comments:

- *Suspend all logging of white pines and other declining species.*
- *When restoring white pine, use local seed sources, inventory pre-settlement pine stands, and protect young pine stands.*
- *When restoring white cedar and white pine, consider deer exclosures or develop new techniques to effectively deal with deer browse.*
- *Report fails to mention decline of white pine and explanations.*
- *The NTL contains few oaks and no reference to oak management? Why?*
- *This is a leading question that assumes pre-settlement forest is most desirable. Paper birch is biggest concern. Pure stands of white pine were historically rare. Because white pine naturally grows scattered, it should be measured differently.*

Response: The issue and comments were primarily addressed in the following GDSs:

GDS-1B: Forest cover type composition on state lands moves closer to the range of cover type composition that historically occurred within the ecosystems found in these three subsections.

GDS-1F. Rare native plant communities are protected, maintained, or enhanced in these subsections.

GDS-3A: Species, age, and structural diversity within some stands will be maintained or increased.

GDS-3B: Some stands on state lands will be managed to reflect the composition, structure, and function of native plant communities.

Issue B3: How will we maintain forest communities of particular concern in these subsections?

Comments:

- *Don't set aside any more forests as Scientific Management Areas or Special Management Areas. Let Ecological Services identify important inclusions during timber harvest layout.*
- *Maintain paper birch. Maintain humid closed-canopy cedar forests. Retain microclimate within 4-6x tree height of cedar stand edge.*

Response: The issue and comments were primarily addressed in the following GDSs:

GDS-1E: Management of state lands within MCBS sites of statewide biodiversity significance implements measures to sustain or minimize the loss to the biodiversity significance factors on which these MCBS sites were ranked.

GDS-1F: Rare native plant communities are protected, maintained, or enhanced in these subsections.

Also, cover type recommendations for paper birch and cedar in Chapter 4, Cover Type Management Recommendations provides additional information.

Development of a system or network of SNA's is beyond the scope of this SFRMP plan. The SFRMP process may recommend areas for SNAs, but the designation process is beyond the scope. Some lands in these subsections *may* be recommended for nomination as SNA's in the future, but that will occur through another review process.

Issue B4. How can intensive management of forest communities be adapted to retain some of the characteristics of natural stand-replacement disturbance events?

Comments:

- *Remove or rephrase question (delete “intensive” and “some of”).*
- *Though hard on the land, it's necessary to establish plantations of cedar, white and red pine, white spruce. Did they exist as pure stands historically, or were they interspersed within the forest? Can they be managed by fire (to reduce herbicide use)?*
- *After heavy cutting, diversity increases and net nitrogen mineralization rates increase (Argonne Experimental Forest). Diversity is reduced as forests mature. Forest type, soil N supply, and stand age affect species richness, not disturbance (e.g., wildfire).*
- *Timber harvest doesn't affect biodiversity.*
- *To truly replicate natural stand-replacing disturbance events, greatly increase harvest patch size.*
- *If plantations are bad, why are they used to increase white pine and spruce?*
- *Thin pine plantations to enhance structural diversity.*

Response: The issue and comments were primarily addressed in the following GDSs:

GDS-1B: Forest cover type composition on state lands moves closer to the range of cover type composition that historically occurred within the ecosystems found in these three subsections.

GDS-1E: Management of state lands within MCBS sites of statewide biodiversity significance implements measures to sustain or minimize the loss to the biodiversity significance factors on which these MCBS sites were ranked.

GDS-1C: Patch management in these subsections maintains existing large patches and increases the average patch size on state lands over time, with consideration of natural spatial patterns.

Also, the issue of managing white cedar, white pine, red pine, and white spruce plantations is addressed in Chapter 4, Cover Type Management Recommendations.

Issue B5. How can management on state lands, especially large patch management, better reflect natural landscape patterns (the size and configuration of growth stages and types resulting from broad-scale natural disturbances) in these subsections?

Comments:

- *Do not continue previous harvests that create quilt-like landscapes. In time, huge areas will lack uniformly dispersed large trees.*
- *Increase forest patch size by increasing size of timber harvest areas.*
- *To mimic historical fires, DNR would need to have huge contiguous clear-cuts.*
- *Leading question. Assumes current management is bad because smaller patches don't emulate historic conditions.*
- *Smaller patches important for game species and are more visually appealing.*
- *Reduce the use of clearcutting and plantations, using a restorative approach to reach a desired future forest composition, managing for larger patch sizes and reduced fragmentation.*
- *Over time, the same landscape can accommodate both edge and interior species through increasing patch sizes.*

Response: The issue and comments were primarily addressed in the following GDS:

GDS-1C: Patch management in these subsections maintains existing large patches and increases the average patch size on state lands over time, with consideration of natural spatial patterns.

Issue B6: How do we limit forest fragmentation and maintain connectivity between habitats?

Comments:

- *Timber harvests don't impact connectivity.*
- *Avoid building too many roads (human-caused fires, trash dumping, poaching, etc.).*
- *A question should be included concerning density of roads, their impacts and their rehabilitation/obliteration.*
- *If forestry activity damages habitat connectivity, DNR cites no research. Fragmentation from agriculture and parking lots differs from fragmentation from forestry activities. No research has identified fragmentation as an issue in a forested landscape.*
- *Maintain corridors and adequate RMZ's as they provide habitat for edge species and travel corridors for animals with large home ranges.*
- *Aggressively buy forestland from willing sellers.*
- *Clearly identify and protect forest areas that have no permanent roads.*
- *Leading questions. Fragmentation is caused by: 1) regenerating stands to younger age classes. This creates a diversity of habitat age classes and is good for the forest. 2) building man-made structures, 3) subdividing large tracts,*

4) development planning in local (county) entities. The latter three cause loss of wildlife and reduced forest products.

Response: The issue and comments were primarily addressed in the following GDSs:

GDS-1D: Habitat fragmentation is managed to minimize the impacts on species that are negatively affected by fragmentation.

GDS-10: Forest access routes are well planned and there is a high level of collaboration with federal, private, and local units of government to share access and minimize new construction.

The issue of forestland acquisition is beyond the scope of this plan and was not addressed in this document.

Issue C1: How can we plan for providing access to the stands identified for management during the 10-year plan period while protecting and minimizing the negative impacts that timber access development or use may have on other forest resources?

Comments:

- *Identify specific (effects) of road building (regarding fragmentation, human-caused fires, dumping, soil compaction, poaching, etc.).*
- *Create well thought-out plans for roads for management, recreation, closures.*
- *If you adopt a hands-off approach, this is not an issue. No new roads. Let current ones suffice.*
- *Road access is related to wildlife habitat.*
- *Bulldozed roads create permanent disturbances and add erosion and fragmentation. Use temporary roads.*
- *Plan roads properly to avoid redundant and too many roads. Instead of destroying existing and future roads, maintain for outdoor recreation.*
- *Don't extend any permanent roads.*
- *Identify clearly forests that don't have permanent roads and protect them.*
- *Destroying existing roads is a waste of limited resources. The MFRC is currently addressing cross-ownership forest road networks.*
- *Ownership of public lands devoid of special features should be consolidated to reduce roads and administrative costs.*

Response: The issue and comments were primarily addressed in the following GDS:

GDS-10: Forest access routes are well planned and there is a high level of collaboration with federal, private, and local units of government to share access and minimize new construction.

Issue D1: How can management of stands within larger areas of biodiversity significance be adapted to enhance biodiversity and native plant community composition, structure, and function?

Comments

- *Leading question. Large patches and past forest conditions aren't necessarily better (more diverse) than small patches and current conditions.*
- *Use concepts like variable retention silviculture and non-traditional methods.*
- *For all techniques, up to date and accurate inventory is a must.*

Response: The issue and comments were primarily addressed in the following GDS:

GDS-1E: Management of state lands within MCBS sites of statewide biodiversity significance implements measures to sustain or minimize the loss to the biodiversity significance factors on which these MCBS sites were ranked.

Issue D2: How do we plan to retain and restore within-stand structural complexity (e.g., vertical structure, stem size and density, coarse woody debris, pit and mound micro-topography) on actively managed lands where natural succession pathways are truncated?

Comments:

- *Tree plantations can decrease stand diversity, but increase forest diversity.*
- *Retain and restore within stands by selective cutting, maintaining residuals, and retaining slash.*
- *Managing multiple-age stands increases diversity of vertical structure.*
- *Managing multiple age-class stands can lead to timber exceeding rotational age, more costly timber harvest, and disease.*
- *Blanket statements such as, "current practices reduce within-stand structural complexity and diversity of vegetation" are very misleading and not appropriate. Forest management practices have vastly improved over the past several years with the advent of the Guidelines and the Minnesota Logger Education Program.*
- *The Guidelines have addressed snags and down woody debris.*

Response: The issue and comments were primarily addressed in the following GDSs:

GDS-3A: Species, age, and structural diversity within some stands will be maintained or increased.

GDS-2C: State lands include a representation of each of the growth stages that historically occurred in the ecosystems found in these three subsections.

GDS-3B: Some stands on state lands will be managed to reflect the composition, structure, and function of native plant communities.

Issue D3. How do we manage forest vegetation to balance the habitat needs of game and nongame species?

Comments:

- *Clear cut older forest. It will increase wildlife diversity into the future.*
- *Manage for pre-settlement conditions.*
- *Northern Minnesota is a reservoir for early successional forests, which are declining in the East.*
- *Stop converting to conifers. Conifer forests contain less wildlife and diversity than aspen forests. If there is no wildlife, there will be no hunters.*
- *Include accurate, field-tested habitat relationships over all gradients of climate and vegetational compositions for game species.*
- *Manage forest and brushland for game species, while providing adequate amounts of ecologically viable old growth stands and rare plant and animal communities*
- *Identify and protect deeryards along the shore.*
- *Manage, protect and rehabilitate habitats of native species (specific mention in many comments included moose, deer, grouse, lynx, snowshoe hare, pine marten, furbearers, boreal owls, goshawks, and woodland caribou).*
- *Focus on keeping abundant species abundant and not place undue emphasis on species that are at the edge of their natural range here (lynx, caribou, etc.).*
- *Special attention should be paid to population maintenance of rare species and species which have declined from pre-settlement levels. Species inventory and monitoring should occur.*
- *Management for non-game species is as valuable as game (birders contribute more to the economy than hunters).*
- *Avoid polarization between single-species game management and management for biodiversity. Game management has not led to the demise of non-game species and has been beneficial to most. Emphasis should be placed on species of most importance to Minnesotans.*
- *Create landscape-level plans to maintain viable populations of wide-ranging species, all native rare species, and declining species. Make inventories and monitor significant populations.*
- *Provide specific measures of public interest as to the management of habitat for particular species, especially economically important ones. (Which species do most people want?) Then manage to retain those populations.*
- *Identify population goals for wildlife species based on their historical numbers.*
- *Identify population goals for wildlife species of current economic importance, such as ruffed grouse, deer, and moose*
- *The desires of the ¾ million hunters in the state and the funding they provide should deserve consideration. Game management should be a priority and not be overlooked in forest planning or attempts to maximize biodiversity. Hunttable populations of game species should be maintained.*
- *Retain high-quality, remote public hunting opportunities.*
- *Support the right to hunt, fish, and gather as retained by Bands in 1854 Ceded Territory.*

- *Ensure that Forestry and Wildlife work together. Are forestry improvements desired over wildlife improvements?*

Response: The issue and comments were primarily addressed in the following GDSs:

GDS-4A: Adequate habitat and habitat components exist, simultaneously at multiple scales, to provide for nongame species found in these subsections.

GDS-4B: Adequate habitat and habitat elements exist, simultaneously at multiple scales, to provide for game species found in these subsections.

Also see, Appendix O, *Terrestrial, Vertebrate Species List* for the North Shore Highlands, Toimi Uplands, and Laurentian Uplands subsections and Appendix P, *Wildlife Habitat Relationships*.

Identification of desirable or undesirable wildlife species and species population goals is *beyond the scope of this plan*.

Issue E1: How can we address the impacts of forest management on permanent wetlands, wetland inclusions, and seasonal ponds?

Comments:

- *Don't develop or recommend guidelines that are more restrictive than existing guidelines.*
- *Forest management poses little risk to wet areas, because they contain little merchantable timber.*

Response: The issue and comments were primarily addressed in the following GDS:

GDS-5B: Forest management on state lands adequately protects permanent wetlands and seasonal ponds.

Issue E2: What vegetative management activities will be allowed to take place within the riparian management zone (RMZ) and how will the appropriate width of the RMZ be determined so that the impacts of forest management activities on water quality, fisheries, and wildlife habitat are minimized?

Comments:

- *Minimize negative impacts to water quality, fisheries, and wild rice.*
- *Extend a larger "no impact zone" than current guidelines recommend, especially in logging areas. The RMZ is too narrow. At least double the setback guidelines for construction.*
- *Current BMPs must be increased for forestry activity areas for sake of aquatic resources, not political compromises.*

- *Coarse woody debris can provide benefits in riparian areas only if there remain truly large trees. Let big trees stand until they enter the stream channel.*
- *Address beaver problems to trout streams.*
- *Don't develop or recommend more stringent guidelines than current MFRC Forest Management Guidelines.*
- *Coordinate forest management with needs of North Shore stream restoration and DNR fisheries.*
 - *Enlarge riparian zone around small tributaries (protect fish spawning)*
 - *Discourage aspen in riparian zone. Encourage cedar, pine, spruce (shade and cool water)*
- *Continue to support and promote RMZ concept. Abide by current agreements. If DNR accepted current RMZ's in the past, why aren't they adequate now?*

Response: The issue and comments were primarily addressed in the following GDS:

GDS-5A: Riparian areas are managed to provide critical habitat for fish, wildlife, and plant species.

Issue E3. How can we address cumulative impacts to aquatic resources of forest management on a watershed/sub watershed level?

Comments:

- *Focus planning efforts on each subwatershed, instead of lumping them together.*
- *Consider impacts of vegetation management (soil erosion, water temperature, etc.) on all land within subwatershed. Because groundwater is scarce in this area, managing for coldwater fishery is especially important.*
- *Some areas can be managed only for timber or for coldwater fisheries.*
- *Rank (sub)watersheds according to degree of stream channel change since pre-settlement times and development potential.*
- *Identify and protect watersheds that provide high-quality trout fishing*

Response: Developing a process to evaluate cumulative effects of timber harvest within a watershed was determined to be *beyond the scope of the SFRMP process*. To evaluate cumulative impacts, forest management on all ownerships needs to be evaluated. At this time, a DNR process has not been developed to evaluate the cumulative effects at a watershed scale. The feasibility, methodology, and coordination of assessing cumulative effects across all ownerships has not been evaluated. If and when a procedure is developed to evaluate cumulative effects on the hydrology, fisheries, and water quality within a watershed or sub-watershed in Minnesota, information regarding forest resource management activities on state lands will be provided.

Issue F1: What is the appropriate timber harvest level on state lands with consideration for the sustainability of all forest resources?

Comments:

- *Create an assessment of effects on forest and related industry and communities of not providing enough quality timber. Assess the economic impact of plant closings.*
- *Manage timberlands sustainably*
- *Manage timberlands using a life-cycle approach (thinnings, regeneration cuts, clearcuts, etc.)*
- *Support DNR forest ecosystem goals and objectives (no reference in SFRMP)*
- *Favor and protect advance conifer regeneration through selective harvest or uneven-aged management. Time harvest with natural seeding of conifers.*
- *Harvest nothing. Forest industry is dying. Let people get new jobs in more sustainable industries.*
- *Place white spruce sawtimber as a high demand group.*
- *Indicate the amount of money the DNR receives for trees.*
- *Indicate current harvest levels and whether they exceed sustainability.*
- *Question assumes DNR is not harvesting enough. In some watersheds, DNR should harvest less.*
- *Balance harvest on forest, human, and wildlife needs.*
- *The PIA (preliminary issues and assessment) is not detailed enough (on a subsection basis) to analyze this. The logging era of the past created a boom/bust harvest cycle that cannot be balanced in one generation.*

Response: The issue and comments were primarily addressed in the following GDS:

GDS-9A: The SFRMP treatment level for each cover type moves toward the desired age-class structure of even-aged managed cover types (both normal and extended rotation forest), and improves the age-structure and timber quality of uneven-aged managed cover types.

Chapter 4, Cover Type Management Recommendations includes information on how harvest levels were developed for each of the cover types.

Assessing the potential economic impacts relating to the quality of timber and amount of harvest on industries and communities *is beyond the scope of the SFRMP plan*. The plan did consider the effects of potential treatment acres and harvest levels over time in moving toward a balanced treatment level from decade to decade.

Issue G1: How can we increase timber productivity on state lands?

Comments:

- *If rotation ages greatly exceed established normal rotation ages, fiber quality and quantity is wasted. Allowing trees to grow past rotational age risks disease and loss of timber value. Don't allow species to live past rotational ages.*
- *Harvest overmature forests, especially aspen and jack pine 60 years old or more. Manage balsam fir on 50-year rotation. Harvest all stands greater than 60 years old over next 7 years. Regenerate early successional stands at or near rotation ages.*
- *Identify sites with highest productivity and intensify forest management activities there. Match sites to species. Regenerate to full stocking levels.*
- *Identify high-risk stands that need treatment.*
- *Evaluate older stands for regeneration.*
- *Add "Forest Health" as a subset under "Productivity" heading.*
- *Remove Timber Productivity section.*
- *Current productivity levels are far below capability. Develop an intensive forest management program that incorporates existing BMPs (recognized by GEIS on Timber Harvesting).*
- *Increase productivity. Removing productive timberlands from harvest consideration means industry looks elsewhere. Don't increase old-growth set-asides or convert early successional forests to late successional forests.*
- *A concern with the clearcut or even-age management in our forests is the loss of sustainability of the soil by loss of carbon in the soil. Recent studies in northern Midwest forests indicate that compaction of the soils and loss of biomass due to harvesting have far more significant affects than previously considered.*

Response: The issue and comments were primarily addressed in the following GDSs:

GDS-6: Timber productivity and quality on state timberlands is increased.

GDS-9A: The SFRMP treatment level for each cover type moves toward the desired age-class structure of even-aged managed cover types (both normal and extended rotation forest), and improves the age-structure and timber quality of uneven-aged managed cover types.

Issue H1. How do we address the impacts of forest insects and disease on forest ecosystems?

Comments:

- *Try to limit them, do the best we can, whatever that may be. All actions taken should be in an effort to keep the forest and land as it was before the invader.*
- *It's not enough to simply have representative or remnant populations, the landscape as whole must contain these species and habitats, so that insects/disease, exotics, fire/blowdown and other impacts will not wipe them out. This doesn't mean provide more deer and grouse habitat, but to mimic natural*

forest processes which benefit all species or provide habitats for those listed species.

- *Allowing trees to grow past rotational age risks disease and loss of timber value.*

Response: The issue and comments were primarily addressed in the following GDS:

GDS-7A: Limit damage to forests from insects, disease, and exotic species to acceptable levels where feasible.

Issue H2: How will we respond to exotic plant species threats/invasions?

Comments:

- *Exotic species and plants.... Is this an emerging problem?*
- *Increased education and enforcement effort could help to identify and enforce against unwanted exotic vegetation. I realize this is asking a lot with current and future budget cuts.*

Response: The issue and comments were primarily addressed in the following GDS:

GDS-7A: Limit damage to forests from insects, disease, and exotic species to acceptable levels where feasible.

Issue H3: How will natural disturbances like fire and blowdown be considered in forest management decisions?

Comments:

- *Clearcuts differ from fire and blowdowns that leave rich nutrient ash, nurse logs, and decaying biomass.*
- *It is impossible to predict natural events or manage for them. With the DNR's desire to mimic natural forest disturbance, natural disturbance events should be welcomed. Blowdown should be salvaged. Fires would encourage birch and jack pine regeneration.*
- *Most blowdown events disproportionately affect overmature early successional forests. Harvesting trees at rotation age will eliminate much of the loss to wind damage.*
- *Rapidly respond to wind events by salvaging down timber before it creates fire and insect infestation issues. Do not consider this salvage harvest as part of annual allowable harvests.*

Response: The issue and comments were primarily addressed in the following GDS:

GDS-12: Disturbance events that occur on state land within these three subsections are promptly evaluated to determine the appropriate forest management needed to address the impacts of the disturbance on the landscape.

Issue H4: How do we manage vegetation to reduce herbivory, crop depredation, nuisance animal, potential spread of animal disease, and possible human health issues (e.g., Lyme disease)?

Comments:

- *Clearly identify species and desirable populations. Why is this statement so ambiguous? The statement certainly leads the reader to believe it is discussing the white-tailed deer. Is the white-tailed deer at such a density as to make them undesirable? What diseases and human health issues are you referring to?*
- *Deer densities are at or below goal. Deer densities may be high during the winter along the northern shore of Lake Superior, but this is a product of lack of the quality wintering habitat, recreational and winter deer feeding, etc.*
- *Forests in the North Shore are important for deer because of the lack of agricultural lands.*
- *Will deer provide obstacles in cedar and white pine regeneration? Yes, but this does not mean that there is an overabundance of deer. A few deer can decimate a new stand of white pine or cedar (white pine and white cedar are highly sought after winter browse for deer). There are plenty of non-lethal deterrents that can be used to keep deer away from new stands of white pine or cedar. Are these techniques more expensive? Yes, but so is replanting stands repetitively. Better forest planning with regard to stand location can also help alleviate the problem.*
- *State which species are causing the problems. Is it moose, deer, bear, beaver, rabbits, hares, grouse or some other species?*
- *Consider using high fences and ungulate barriers for restoration of white cedar or white pine.*
- *Reader assumes deer cause all sorts of problems. Show the data! Less than 2% of land is urban/rural; less than 2% is hay/pasture. Deer are within acceptable limits. Deer don't affect human health except being possible transmitters of Lyme disease, which is not prevalent in this area.*
- *There are already too many deer in relation to maintaining sustainable ecosystems, and deer numbers and browsing effects should be reduced.*

Response: The issue and comments were primarily addressed in the following GDS:

GDS-7B: Reduce the negative impacts caused by wildlife species on forest vegetation on state forestlands.

Identification of desirable or undesirable wildlife species and population levels is *beyond the scope of this plan.*

Issue H5: How should forest management respond to global climate change within the planning period?

Comments:

- *Climate change issues are very political, you may want to do some more research on this subject.*
- *Recognize that timber harvest levels in a watershed will become more important to the health and sustainability of its coldwater resources if the climate warms. A gradual release of the snowfall is crucial for sustaining coldwater fisheries in North Shore tributary streams.*
- *Forest management cannot respond to climate change. If the climate is indeed changing (temperature increasing), then it would be futile to increase management for more northern species in preparation for warming. These species will eventually be pushed out no matter the efforts.*
- *If oaks and prairies displace boreal ecosystems, and fire frequency and intensity increase with warmer drier weather, don't be overly concerned with caribou, lynx, goshawks, and conifers.*

Response: The issue and comments were primarily addressed in the following GDS:

GDS-7C: Forest management on state lands attempts to mitigate global climate change effects on forestlands. Management is based on our current knowledge and will be adjusted based on future research findings.

Issue I1: How will forest management activities minimize impacts on visual quality?

Comments:

- *Minimize visual impacts along water bodies, trails, and roads.*
- *Designate some areas that loggers can log and protect much of the rest. No logging in these areas, let the forest take care of itself.*
- *How much of the Lb 11 Tettegouche Till Plain (and other LTAs) is within sight of any of the park?*
- *Add the impacts on visuals of unmanaged forests.*
- *Correctly managed forests naturally retain their scenic beauty and visual quality.*
- *The visual quality issue is a human value that has little to no ecological application.*
- *The concept of scenic beauty is highly complex, emotional, and individualistic.*
- *Visual quality issues are thoroughly and adequately covered in the MFRC Guidelines. The DNR must abide by its agreement to support the Guidelines. The DNR should not develop or recommend more stringent guidelines during the SFRMP process. The flexible nature of the Guidelines allows on-site managers to deviate from set standards if he/she feels the need to based on site-level water quality, wildlife habitat, or visual concerns.*

Response: The issue and comments were primarily addressed in the following GDS:

GDS-8: Minimize forest management impacts on visual quality.

Issue J1 (Added): How will cultural resources be protected during forest management activities on state-administered lands?

Comment:

- *Impacts to heritage resources should be an additional preliminary issue to be included. Heritage resources encompass a wide variety of areas such as archeological sites, historic structures, spiritual sites, sugarbushes (areas to gather maple sap), and wild ricing locations. These types of resources should be preserved and protected during management activities.*

Response: This *added* issue and comments were primarily addressed in the following GDS:

GDS-11: Cultural resources will be protected on state-administered lands.

Issue K1: How can we ensure that rare plants and animals, their habitats, and other rare features are protected in these subsections?

This issue was added based on input from members of the SFRMP Team.

Response: This *added* issue was primarily addressed in the following GDS:

GDS-1G: Rare plants and animals and their habitats are protected, maintained, or enhanced in these subsections.

6.4 Other Issues Submitted - Addressed Elsewhere:

Issues that were recommended in public comments that are addressed in existing issues, strategies, or cover type management recommendations in the plan:

a. Is the DNR Properly Regenerating Aspen Forests?

Comments:

- *Add an issue regarding regeneration of early successional forests. Is the DNR properly regenerating aspen forests?*

Response: The suggested new issue on proper regeneration of aspen forests was not added to the plan, but we feel it is addressed in several locations in the draft plan. The primary location is in the aspen cover type management recommendations found in Chapter 4 where information on rotation ages and treatment methods in the aspen cover type can be found. GDSs that also address this recommended new issue are:

GDS-2D: The appropriate amount of young, early successional forest is distributed across the landscape over time.

GDS-4B: Adequate habitat and habitat elements exist, simultaneously at multiple scales, to provide for game species found in these subsections.

GDS-6: Timber productivity and quality on state timberlands is increased.

b. Birch forests are declining and not being regenerated.

Comments:

- *Birch forests provide crucial habitat for species that evolved with them, species that define northern forests for many people.*
- *If birch forests are not regenerated in timely fashion there will be:*
 - *Reduction in species that evolved with birch forests.*
 - *Loss of cultural resource for American Indians.*

Response: The suggested new issue of birch decline and lack of birch regeneration was not added to the plan, but we feel it is addressed in several locations in the draft plan. It is primarily addressed in the management recommendations for the birch cover type in Chapter 4. Other locations within the plan that address this suggested new issue are:

GDS-2A: Even-aged managed cover types will be managed to move toward a balanced age-class structure.

GDS-2D: The appropriate amount of young, early successional forest is distributed across the landscape over time.

GDS-4B: Adequate habitat and habitat elements exist, simultaneously at multiple scales, to provide for game species found in these subsections.

GDS-6: Timber productivity and quality on state timberlands is increased.

GDS-11: Cultural resources will be protected on state administered lands.

c. Sport Hunting

Comments:

- *The DNR does not regard impacts to sport hunting when considering changes to forest management regimes.*
- *Hunting is an issue because it is the greatest dispersed form of forest recreation.*
- *If DNR does not recognize negative consequences of forest management on game species, then*
 - *Loss of legislative and funding support*
 - *Loss of income for license sales and revenues*
 - *Loss in related income from hunters frequenting small communities.*

Response: This issue is partially beyond the scope of the plan so it was not added to the plan as a new issue. The portion dealing with vegetation management and providing habitat for game species is primarily addressed in the following GDSs:

GDS-4B: Adequate habitat and habitat elements exist, simultaneously at multiple scales, to provide for game species found in these subsections.

GDS-2D: The appropriate amount of young, early successional forest is distributed across the landscape over time.

d. Interagency Cooperation

Comments:

- *Make extra effort to consult tribal organizations and tribes during development and implementation of the SFRMP.*
- *Include a category to discuss opportunities for interagency cooperation.*
- *Cooperate with other entities to prevent “management fragmentation.”*

Response: This topic was not added as an issue, but interagency cooperation is recommended in several places in the plan (e.g., relating to patch management and road access planning). SFRMP plan documents and the 10-year planned treatment information will be provided or made available to other agencies managing forestlands in these subsections. Currently, the DNR notifies other agencies when the annual harvest plans and annual plan additions are posted on the DNR Web site for review.

Two current examples of interagency cooperation are:

- DNR staff have been participants in the MFRC Northeast Landscape Regional Committee planning process for the Northeast Landscape Region (includes Cook, Lake, St. Louis, and Carlton counties). This plan produced landscape direction for agencies and other landowners (on a voluntary basis) and developed strategies for implementing this landscape direction. The MFRC Regional Landscape Committees will have a role in cross-ownership coordination.
- The DNR is a participant in the Manitou Forest Collaborative. This collaborative has been underway for several years and aims to improve integration of biodiversity, timber, and recreational objectives in the multi-landowner Manitou Landscape. Participants in the collaborative include: Lake County, The Nature Conservancy (TNC), Potlatch, and Minnesota DNR Divisions of Forestry, Fish and Wildlife, and Ecological Services (including the Minnesota County Biological Survey (MCBS) and Ecological Land Classification (ECS) programs).

e. Monitoring

Comments:

- Take a thoughtful, careful, and conservative approach to forest management, using the best available science. Monitoring and evaluation must have a priority and be included in all forest management prescriptions.
- For site-level management, using concepts like variable retention silviculture and non-traditional silvicultural methods, in conjunction with good evaluation and monitoring that would lead to learning and adaptation, is very important.

Response: Monitoring was not added as an issue but information regarding monitoring is included in the Chapter 5, Monitoring.

6.5 Other Issues Submitted - Beyond the Scope

a. Re-introduction of wildlife species

Comments:

- Fauna re-introduction, e.g., caribou, wolverine, etc.

Response: The issue is beyond the scope of this SFRMP plan that deals with issues relating to vegetation management.

b. Recreational Trails

Comments:

- *Create forest guidelines for siting recreational trails and sites, including doing field surveys.*
- *Keep North Shore open to responsible snowmobiling.*
- *Don't extend any motorized or non-motorized trails within north shore state forest.*
- *Close all forestlands to OHV except for designated trails.*

Response: The issue is beyond the scope of this SFRMP plan. Recreational trail planning is being completed in a separate process where trails in state forestlands are being inventoried and classified for off-highway vehicle (OHV) use (or non-use) on a state forest basis. The inventory of roads and trails in state forests within these subsections is currently being completed. There will be an opportunity for public review in the OHV planning process as the plans for the state forests are developed. See Page xiii in the *Preliminary Issues and Assessment Document*.

GDS-10 provides direction on post-sale treatment of new roads and trails used for timber access.

c. Scientific and Natural Area (SNA)

Comments:

- *Place more emphasis on the SNA network, while complementing the USFS Potential Research Natural Areas, including aquatics.*
- *Don't set aside any more forests as Scientific Management Areas or Special Management Areas. Let Ecological Services identify important inclusions during timber harvest layout.*

Response: Development of a system or network of SNA's is beyond the scope of this SFRMP plan. The SFRMP process may recommend areas for SNAs, but the designation process is beyond the scope. Some lands in these subsections *may* be recommended for nomination as SNA's in the future, but that will occur through another review process.

d. Land Ownership:

Comments:

- *DNR should maintain its lands with the BWCA wilderness rather than exchange for National Forest outside. Wilderness management should also be part of the DNR's mission.*
- *Ownership of public lands devoid of special features should be consolidated to reduce roads and administrative costs.*
- *Aggressively buy forestland from willing sellers.*

Response: Purchase or exchange of forestlands is beyond the scope of the SFRMP plan.

6.6 List of Organizations and Individuals That Submitted Public Comments

Comments Regarding Preliminary Issues and Assessment Document First Public Comment Period ending December 26, 2002

The 30 comment letters/e-mails/faxes received are listed in alphabetical order by organization (if organization name was included on the letter, comment form, fax, or e-mail) or last name (if by an individual). For organizations, the name of the person that signed the letter or submitted the comment is included.

1. 1854 Authority, Andy Edwards, Duluth
2. American Lands Alliance, Lois Norrgard, Bloomington
3. Boise Paper Solutions, Mary K. Perala, International Falls
4. Mike Elling, Duluth
5. Fond du Lac Resource Management Division, Mike Schrage, Cloquet
6. Friends of the Boundary Waters Wilderness, Sarah Strommen, Minneapolis
7. Hedstrom Lumber Co., Inc., Howard Hedstrom, Grand Marais
8. Waid Johnson, Minneapolis
9. Dennis Kaleta, Two Harbors
10. Lake States Lumber Association, Rick Degen, Iron Mountain, MI
11. Gary Larson, Minnetrista
12. Jeffrey Latzka, St. Cloud
13. John Lenczewski, Eden Prairie
14. Bill Lorence, Maple Grove
15. Kamloops Advocates, Peter Lundberg, Duluth
16. Tom McCann, Grand Marais
17. T.R. Michels, Wanamingo
18. Minnesota Center for Environmental Advocacy, Janet C. Green, Duluth
19. Minnesota Deer Hunters Association, Corey Class, Grand Rapids
20. Minnesota Forest Industries (MFI), Tim J. O'Hara, Duluth
21. Minnesota Timber Producers Association (TPA), Rachel Benishek, Duluth
22. Shawn Perich, Hovland
23. Pheasants Forever, John Edstrom, St. Paul
24. The Ruffed Grouse Society, Rick Horton, Grand Rapids
25. Sierra Club, Don Janes, White Bear Lake
26. John Thompson, St. Louis County Land Department, Duluth
27. UPM – Blandin Paper, James R. Marshall, Grand Rapids
28. US Fish and Wildlife Service, Division of Migratory Bird Management, James R. Kelley, Fort Snelling
29. Robin Vora, Bend, OR
30. Unknown

