

December 5, 2002

Gaylord Paulson
DNR Division of Forestry
500 Lafayette Road
St. Paul, MN 55155-4044

Re: North Shore SFRMP

Dear Mr. Paulson:

The Ruffed Grouse Society appreciates the opportunity to comment on the forest management direction proposed for the North Shore Highlands, Toimi Uplands and Laurentian Uplands Subsections by the Division of Forestry. The following comments result from a thorough review of the November 2002 Preliminary Issues and Assessments (PIA) for the Subsection.

The style and level of detail of the PIA are reminiscent of Federal Environmental Analyses and Environmental Impact Statements. The Division of Forestry should seriously consider the implications of patterning the public input process after the Forest Service. Federal projects become increasingly bogged down in analysis and legal battles, causing a drain on funding and manpower to the point of inability to act effectively or in a timely manner. In fact, the Forest Service is currently attempting to find a way to streamline their analysis process to address this concern. Input is often biased because many people are intimidated by the documentation detail and don't respond. Those that do respond require more time for analysis, thus affecting the agency's ability to make timely decisions. The two week response time offered for this 2-pound PIA was clearly inadequate for a complete analysis of the data presented.

The Division's decision to distribute a summary of internally derived preliminary issues to the public will affect the type of response received from the public. These issues are frequently presented in a manner that leads the reader to conclusions that may not indeed be factual. In fact, there is little scientific support but abundant opinion and conjecture in the "issues" and consequences presented by the planning team. For example, issue H4 clearly is referencing deer populations and suggests that deer are overpopulated and causing crop damage, forest health concerns, nuisance animal complaints and wildlife disease/human health issues. However, there is no evidence that deer exceed population goals in these subsections. Deer populations in the North Shore area are ultimately controlled by winter weather and fluctuate accordingly.

However, the uninformed reader would be lead to believe that there are too many deer and their comments would reflect a desire to reduce deer populations. The leading nature of the preliminary issues suggests to the casual reader that the best forest is one that is restored to historic conditions and therefore supposedly maximizes biodiversity. Is this the message the DNR intended to send the public? The process would be much better served if the Division simply asked the public what forest issues they feel are important and how they want the

Division to manage the public resource, rather than presenting a pre-scripted set of issues that reflect the personal views of the authors. **Note: Please send us a list of the DNR employees on the planning team for this subsection.**

The PIA is laden with references to the value of maximizing biodiversity and restoring species and landscapes to historical conditions. The reader senses that biodiversity is an all-encompassing good thing and that any "movement away from biodiversity" is inherently bad. Certainly biodiversity is an important forest sustainability factor to consider, but it is only one of many factors including public recreation desires, economic needs and visual considerations. Is the goal of maximizing biodiversity to have equal numbers of each plant and animal on the landscape? Of course not. Once creatures represented on the landscape have adequate habitat in which to thrive, humans make decisions on their relative abundance. These are not biological decisions so much as socio-economic ones.

We are concerned about the appropriate management of rare species on the fringe of their natural range, like wolverine, lynx, caribou and goshawks. While these species occasionally enter Minnesota, they will never be abundant here. In the words of Bill Berg, "We could manage all of northern Minnesota as lynx habitat and still not have lynx". The Society feels that managers should focus on keeping abundant species abundant and not place undue emphasis upon species that are rare here but abundant elsewhere.

Maximizing biodiversity also does not mean maximizing the number of species found on every acre. Some natural systems are inherently simple. There are suites of wildlife and plant species that are adapted to these natural environments that would not thrive if they were more "diverse". The Division must instead focus on landscape-level diversity. Only by providing a mix of forest types in different growth stages can we provide for the needs of all of Minnesota's flora and fauna. But we need high quality young early successional stands as much as we need high quality old growth. The balance of types and age classes is again a socio-economic decision. Sportsmen and those that derive their living from forest products typically prefer a greater proportion of young forests than older ones.

The Society is disturbed with the negative opinion towards aspen found throughout the PIA. Aspen forest communities are very valuable to both wildlife and to the economy of northern Minnesota. The continued decline in aspen regeneration on state and national forests is negatively affecting many species that rely upon young forest habitats. Young forests are extremely important to maintaining biodiversity in northern Minnesota. Aspen forests offer unparalleled opportunities to maintain this ephemeral and increasingly rare habitat on the landscape. The Ruffed Grouse Society is concerned about the on-going declines in aspen communities in the eastern deciduous forest and especially the Great Lakes Region. Over 21% of the aspen forests in the Great Lakes States have been converted to other forest types in the past 40 years. Converting aspen, directly or indirectly through lack of management, will negatively effect populations of grouse, deer, moose and woodcock as well as those predators that rely on their abundance.

The Society is very concerned about the DNR's lack of acknowledgement of the importance of hunting to the public. This PIA portrays hunters as simply another special interest group with a focus on single-species management (viewed as a bad thing), in conflict with other user groups concerned with preserving biodiversity (viewed as a good thing). The DNR should realize that the 3/4 million hunters in this state do not want to see game management diminished in importance within the agency, do not feel that they should be overlooked in forest management planning and do not want to see game populations decreased in favor of vague concerns for biodiversity. Sportsmen have funded a greater proportion of the activities on state lands than any other segment of society through licenses, fees and excise taxes on sporting equipment. We want the DNR to maintain sufficient forest habitat to support huntable (rather than viable) populations of game animals. Towards that end, what exactly are the wildlife population and habitat goals for game species in these subsections? The PIA states that the Division of Wildlife sets these goals, but goes on to state that SFRMP process will "establish habitat goals" (PIA page XV). Which is it?

The DNR maintains a seat on the Forest Resources Council (MFRC) and was actively involved in the development of the MFRC Voluntary Site-Level Forest Management Guidelines (Guidelines) and agreed to abide by them. The Guidelines detail how to best protect riparian areas, visual quality, soil productivity and a host of other factors. It is inappropriate for the DNR to now suggest during the SFRMP process that these guidelines are inadequate and ask the public what should be done about it (Preliminary Issues E1, E2, I1). 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, visual concerns, etc. The DNR must abide by its agreement to support the Guidelines.

PRELIMINARY ISSUES

A1. & A2. The Ruffed Grouse Society feels there should be a mix of young and old forests and of different types appropriate to the soils and topography of the subsections. Judging from the descriptions of these subsections, there was historically an abundance of early successional forests here, including aspen, birch, fir and jack pine. We feel that these species should continue to be featured on this landscape and maintained at current levels. Where will they be maintained if not on landscapes suited for them? Most of the early successional types should be harvested at or near their rotation ages. For example, currently over 48% of the aspen on state lands in these subsections is beyond rotation age. These should be prioritized and regenerated in a timely manner

We are curious why A2 specifically asks for the appropriate amount, type and location of old forests when A1 already presents that issue. Why is there not a balancing question pertaining to young forest considering the importance of young forests for wildlife and biodiversity? This is an example of the leading nature of the preliminary issues.

The DNR only administers 14% of the land in these subsections (9% of the timberland). The

Superior National Forest administers a much larger percentage, including some that is within the Boundary Waters Canoe Area Wilderness (BWCAW). Between the BWCAW, Scientific Natural Areas, Special Management Complexes and riparian corridors there is an abundance of older forest in these subsections. The Generic Environmental Impact Statement (GEIS) set old growth and Extended Rotation Forest (ERF) goal levels. Why not refer to those models? The DNR does not operate in a vacuum. State-administered lands should be managed as productive timberlands to the greatest degree possible to offset the old forests dominating other ownerships.

B1. We agree that today's forests are not like those that existed prior to European settlement. But are they less diverse? We don't think so. If statements like these are going to be made by the DNR they should be supported scientifically with citations. This issue again leads the reader to the conclusion that past landscapes were inherently better and we need to restore them. The public has not charged the DNR with restoring past landscapes or managing for historical conditions. In fact, we could not do this without the frequent use of catastrophic wildfire, which is a social and economic impossibility. Past landscapes can give us insights to the potential of the land but we must not focus on restoring those landscapes. Rather, we need to balance ecological concerns with the fact that 5 million Minnesotans live, work and play within the state's forests.

There is no evidence that today's forest management methods, cover types or age class distributions are leading directly to the demise of any creature or habitat type. Forest animals are very resilient. In fact, very few (if any) were extirpated even after the intense logging era of the last century. There are many different factors causing the declines of currently listed species, and certain forest conditions (e.g. complete deforestation) may be contributing factors for some. But by and large we are currently providing habitat for all species.

B2. Again, a very leading question suggesting the state should restore past landscapes and that certain species are still declining. A simple review of the charts on pages 3.22 to 3.66 suggests that within the last 10-20 years there has been a huge increase in the regeneration of white pine, red pine, jack pine, white spruce and black spruce. White cedar is very difficult to regenerate, but as a climax community with little even-aged harvest, you would expect to see little in the way of young cedar forests. The biggest real concern we have is for paper birch, an early successional species that is short-lived and difficult to regenerate. It is important as one of the species that define the north woods for many people. The DNR must seriously consider methods to regenerate existing birch stands to type. It would help if these stands were regenerated at optimal rotation age so they are vigorous enough to sprout.

White pine historically rarely occurred in pure stands. Rather, scattered individuals comprised a supercanopy layer over other forest types. Other indices besides "acres of type" should be used to assess the recovery of white pines on Minnesota's landscape, like presence/absence in plots or trees/acre in all types.

B3. Wetlands, fens, deciduous swamps and wet forests are at little risk from forest

management, simply because they have little merchantable timber. Other forest types evolved with some level of disturbance and require it for periodic maintenance and regeneration. We do not support expanding the acres of forest set aside as Scientific Management Areas or Special Management Complexes. However, Division of Ecological Services personnel could identify important inclusions during timber harvest layout.

B4. If the DNR wants to truly replicate natural stand-replacing disturbance events, it must greatly increase harvest patch sizes. Natural fire events on this landscape typically impacted 1,000 to 10,000 acres. Creating larger patch sizes would decrease edge effects, but the public will not stand for it, as they displayed in the 1980's. Patch sizes were much larger in the early portion of the second growth utilization era, but public outcry over large clearcuts led to smaller harvest units.

It is interesting to note that this issue paints plantation-style management as bad due to soil displacement, etc. However, Table 3.3a and the subsequent charts suggest that much of this plantation-style management has been utilized to increase the acreage of white pine and white spruce on the landscape by harvesting and treating balsam fir stands. This is simply the implementation of other goals stated as issues elsewhere in the PIA.

B5. This issue also leads the reader to assume that current management is bad because it creates smaller patches than historically occurred. Smaller patches have benefits to many species of animals deemed important to sportsmen, including deer, grouse and hares. Smaller patches are also less visually dramatic to the general public. However, this issue suggests that *not* increasing patch size will lead to the loss of species (which ones?), and increases of other species (presumably deer) to the point that they harm the forest. We feel that these suppositions need scientific collaboration before they are presented to the public as fact.

B6. This leading issue lumps forest management with residential development and states that both are causing forest fragmentation. Regenerating forest stands back to younger age classes is habitat fragmentation. This creates a diversity of habitat age classes and is good for the forest. Replacing forests with man-made structures is forest fragmentation and is perhaps the single biggest threat to the forests of northern Minnesota. As larger forested tracts are subdivided and sold there is a greater likelihood of development upon them. This not only reduces habitat where the house sits, but also reduces the likelihood of the rest of the property being actively managed by the landowner. The end result is a loss of wildlife habitat and reduced forest products availability. The latter increases the pressure to meet demand from the state's remaining timberlands. This issue is larger than the DNR can tackle alone. Recent forest tax reforms are designed to encourage landowners to keep forested lands intact and managed as forestlands. However, development planning is typically in the jurisdiction of the counties.

C1. The Guidelines address how to minimize negative impacts of forest roads and skid trails on soils and water resources. The Society does not support obliterating forest roads, especially in forest types that require frequent entry for management purposes. We view obliteration as a

waste of limited resources. The MFRC is currently addressing cross-ownership forest road network issues.

D1. Again, the DNR is not charged with restoring past forest conditions. This is the fourth example of an issue leading the reader to think that larger patches are better than smaller ones and that if we do not increase patch size we will see losses to species and biodiversity. If the DNR does not perform large patch disturbance, they should not create large patches of old forests. If the intent is to recreate historic conditions, you cannot have one without the other.

D2. Again, the Guidelines have addressed snags and down woody debris. The DNR cannot arbitrarily dismiss sections of the Guidelines because individuals don't agree with them. 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.

D3. This issue assumes that management for game and non-game species is mutually exclusive and that you either perform biodiversity management or single-species game management. That attitude only serves to further polarize the public. Past game management has not lead to the demise of any non-game species, and has in fact been beneficial to most. In a gross sense, we need to provide habitat for all species routinely found in the state, but an emphasis is placed on those that are more important to the people of Minnesota. We emphasize loons, walleyes, eagles, moose and wolves because they define the state in most people's minds. We emphasize deer, grouse, ducks, pheasants and turkeys because hundreds of thousands of sportsmen enjoy pursuing them afield and have a reasonable expectation of success. We emphasize some songbirds because people like to see them in the field and at feeders. We also protect and enhance populations of threatened and endangered species. However, less emphasis is placed on species that do not fall in these categories. Some may not agree with this notion, but it is an accurate portrayal of the situation.

To set the record straight, woodland caribou were on the extreme southern edge of their range in Minnesota and were dependant upon the vast wildfires that created habitat for them. None has been seen since the last fire roamed free in the border lakes region. It has nothing to do with current forest practices except maybe the exclusion of logging in the Boundary Waters. Regarding the Wildlife Habitat Assessment and Analysis (Section 7.1), we would like to know which subsections have existing populations of swift fox, wolverine, mule deer caribou and pronghorn.

E1. Riparian issues were hotly debated by the MFRC during Guideline development. The Guidelines contain enough flexibility to allow managers to adjust as needed for site conditions. It is not appropriate for the DNR to suggest that these are not adequate considering the agency's involvement in the development process and subsequent adoption of the Guidelines.

F1. The GEIS contains data on the level of timber harvesting that is sustainable within the

state, but it is my understanding that it is not broken down by subsections. The PIA does not provide enough detail to perform this analysis. However, one can readily look at the charts from pages 3.6 to 3.66 and see that there are hundreds of thousands of acres of mature to overmature forest available for harvest. Almost half of the aspen resource is beyond rotation age, as is almost all of the birch and a good portion of the jack pine and balsam fir. Harvesting that acreage would probably not be sustainable over time. The logging era of the past century left us with legacy of boom and bust harvest that we cannot balance in one generation. We may need to accelerate harvest at certain times to ensure that forests don't succumb to insects and disease, thus increasing fire risks.

G1. The timber industry must increase forest productivity and intensify forest management techniques when the supply of timber is restricted. When productive timberlands are removed from harvest consideration, industry must meet their needs on the remaining available lands. This is not always beneficial for wildlife or other resources. If early successional stands were regenerated at or near rotation ages there would be ample supply, especially given that 73% of the timber harvested in these subsections consisted of early successional species. In addition, more fiber would be available if later successional forests were actively managed through progressive thinnings. This would reduce the need to "capture mortality" (which decreases snags and down woody debris), enter stands more frequently (which increases risk of soil compaction, water problems and access systems) and convert native forests to plantations (simplifying ecosystems in the process). Increasing old growth set-asides and converting early successional types to later successional forests exacerbates the supply situation.

H3. Most blowdown events disproportionately affect overmature early successional forests. The 1999 BWCAW blowdown is a good example. Most effected trees were old aspen, jack pine and balsam fir. Harvesting trees at rotation age will eliminate much of the loss to wind damage. We must rapidly respond to wind events by salvaging down timber before it creates fire and insect infestation issues. These salvage harvests should not be considered part of the annual allowable harvest.

H4. As stated earlier, this issue is highly disturbing for its inflammatory and leading nature. It is readily apparent that the author(s) is referring to deer. The reader gets the impression that deer are causing all sorts of problems to the forest, crops and people in this landscape. There is no substantiation to this. Less than 2% of these subsections are in urban/rural development and less than 2% are in hay or pasture. Deer populations are within acceptable limits and are controlled by infrequent harsh winters that greatly reduce their numbers. Deer carry no diseases that are transmissible to humans except perhaps Lyme disease, which is not prevalent in this area.

The Ruffed Grouse Society is greatly disturbed by the clear anti-game management, especially anti-deer sentiments expressed in this PIA. Minnesota sportsmen and women pursue deer more than any other species, and we feel that they would be very upset to learn that some within the DNR are trying to reduce deer numbers in areas where they are not causing problems.

H5. Increasing temperatures in Minnesota may cause boreal ecosystems to retreat into Canada over time. Prairies and oak woodlands could expand into the north. Fire frequency and intensity will increase with warmer drier weather. In light of these scenarios it seems we should not be overly concerned with caribou, lynx, goshawks or conifers.

II. Visual quality issues are thoroughly and adequately covered in the MFRC Guidelines.

NEW ISSUES

Is the DNR properly regenerating aspen forests?

- **Why is this an issue?** Densely stocked regenerating aspen stands in northern Minnesota resulted from stand-replacing wildfires. Now we must create these habitats with even-aged forest management. Young aspen communities are crucial in providing habitat for native plants and a suite of wild animals that are adapted to their particular habitat features. Over 60 songbird species were recorded using young aspen stands in one Minnesota study. Recent changes in silviculture techniques, including pre-commercial thinning, commercial thinning, shelterwood harvests, excessive residuals and conifer underplanting, are creating unnatural conditions in which young aspen cannot thrive in the stocking densities required by wildlife.
- **What are the likely consequences of not addressing this issue?** 1) Reduced productivity of future aspen stands; 2) reduced populations of important game species, particularly ruffed grouse, deer and American woodcock; 3) reductions in songbird populations, notably the highly imperiled golden-winged warbler; 4) loss of plant and animal diversity and the social, economic and ecological value of these species.
- **How can this issue be addressed by vegetation management decisions on DNR-administered lands?** When the DNR makes a decision to regenerate aspen forests on DNR-administered lands, it can properly regenerate the stands through clear-cut harvests rather than resorting to alternative methods to appease some segments of the public that don't appreciate the role these systems play in our forests.

Birch forests are declining and not being regenerated.

- **Why is this an issue?** Birch forests not only provide crucial habitat for species that evolved with their presence, they are a species that defines northern forests for many people. Evidence shows that most stands are overmature and there are few young birch stands.
- **What are the likely consequences of not addressing this issue?** 1) Loss of the species and animals that require its presence; 2) loss of a cultural resource for Native Americans.
- **How can this issue be addressed by vegetation management decisions on DNR-administered lands?** The DNR must make a conscious effort to discover ways to regenerate birch effectively and regenerate old stands before they lose their ability to do so.

Few of the early successional forest types in these subsections are being regenerated in a timely manner.

- **Why is this an issue?** Young forests play a critical role in creating and maintaining biodiversity. Many prey species depend upon dense young forests to provide cover from predation and an ample supply of available foods. The Wildlife Habitat Assessment and Analysis suggest populations of ruffed grouse, flycatchers, veerys, chestnut-sided warblers, golden-winged warblers, mourning warblers, redstarts, common yellowthroats and eastern towhees are all declining. These are all early successional species. Meanwhile, all woodpecker species are on the increase.
- **What are the likely consequences of not addressing this issue?** 1) Loss of biodiversity; 2) declining forest health; 3) increased risk of insect infestation, disease and wildfire; 4) lost forest productivity; 5) loss of plant and animal diversity and the social, economic and ecological value of these species.
- **How can this issue be addressed by vegetation management decisions on DNR-administered lands?** Increase the level of early successional forest harvest before the window of opportunity to do so is lost and these stands succeed to later seral stages.

The DNR does not regard impacts to sport hunting when considering changes to forest management regimes.

- **Why is this an issue?** Sportsmen are a unique segment of society that spends a considerable amount of time and energy in the forest. Hunting is the single greatest dispersed recreation form in the forested landscape. The agency cannot underestimate the importance of considering the negative consequence of forest management changes on game species.
- **What are the likely consequences of not addressing this issue?** 1) loss of legislative and funding support from sportsmen's groups; 2) loss of income from license sales and revenues; 3) loss in related income from hunters frequenting small forest communities.
- **How can this issue be addressed by vegetation management decisions on DNR-administered lands?** Increase the prominence of game management within the Department and consider impacts to game populations with the level of gravity they deserve.

SUMMARY

The Ruffed Grouse Society feels that this public input process is inadequate for truly capturing the public's opinion on subsection forest planning. The Preliminary Issues are misleading and unscientific, offering the public a view of forest management tainted by the opinions of the person or Division that drafted the issue. The Department would benefit from not issuing Preliminary Issues for future subsections and from redesigning the public input process.

It is apparent that the planning team's input is not balanced between the Divisions of Wildlife, Forestry and Ecological Services. There is very little support for game management and no recognition of the role of sport hunters in the northern forests. It is also apparent that there is a

bias against aspen forests, clearcut harvesting, small patch sizes and deer. The DNR is not charged with restoring historic conditions on state forestlands. Doing so is not only biologically impossible, it would wreak havoc on the social and economic fabric of the state. We suggest the team begin laying out a forest management plan that balances ecological, social and economic concerns for the region based on the present and future needs of the people of Minnesota.

Please contact me if you have any questions or concerns regarding the Society's comments on the North Shore SFRMP.

Sincerely,

Rick Horton
Forest Wildlife Biologist

cc: Mr. Tim Bremicker
Mr. Mike Carroll
Ms. Lee Pfanmueller
Mr. Dan Dessecker