



Commissioner Sarah Strommen
Minnesota Department of Natural Resources
500 Lafayette Road
St. Paul, MN 55155-4040
Via email: commissioner.dnr@state.mn.us

October 24, 2023

Dear Commissioner Strommen,

We have examined the Midpoint Assessment of Forest Management Strategic Direction: Sustainable Timber Harvest Implementation (STHI) Report recently released by the Minnesota Department of Natural Resources. While acknowledging some efforts made, we have identified several critical concerns that must be urgently addressed to ensure the long-term health and sustainability of our Fish and Wildlife lands.

Firstly, it is imperative to emphasize that the current timber harvest implementation seems to be unduly prioritizing timber production for the primary purpose of producing income over essential habitat conservation and management efforts. This one-sided focus has already led to the loss of heritage woods, and if not rectified promptly, it will lead to irreversible damage to our forest habitat ecosystem, including the potential extirpation or extinction of special status species.

Although the report suggests some improvements for the latter part of the implementation period, we find these proposed changes to be vague and inadequate in addressing the fundamental issues concerning the bias towards the timber industry. Furthermore, the absence of specific measures for proper documentation and coordination in forest management raises concerns about the transparency and efficacy of the entire planning process.

A troubling issue highlighted in the report is the lack of acknowledgment of the requirements outlined in the Pittman Robertson Act.¹ The failure to adhere to the Act's

¹ 50 CFR § 80.54 What activities are ineligible for funding?

The following activities are ineligible for funding under the Acts, except when necessary to carry out project purposes approved by the Regional Director:

- (a) Law enforcement activities.
- (b) Public relations activities to promote the State fish and wildlife agency, other State administrative units, or the State.



regulations, particularly regarding the prohibition of income-generating activities on federally procured lands, is a serious breach that demands immediate attention and rectification.

Another area of concern is the high percentage of no-bid sales, especially from Fish and Wildlife lands, which raises questions about the efficacy of the sales design and the marketability of the forest products offered. Such inefficiencies could have detrimental effects on the sustainability of timber harvest implementation in the forest and its diverse ecosystem.

Moreover, the disproportionate allocation of logging activities between Fish and Wildlife lands and Forestry lands, coupled with the lack of clarity on the effects of salvage of ash trees in light of the emerald ash borer invasion, demands urgent reconsideration to ensure the preservation of the forest's overall ecological balance.

Specific pages of the report, such as page 6, 12, 20, 28, 34, 48, 51, 53, 54 and 57, highlight crucial areas where the current timber harvest implementation plan fails to adequately address the underlying issues of sustainable forest management and conservation. Particularly, the disregard for habitat management decisions from relevant wildlife biologists and fisheries biologists, as well as the omission of clarity regarding treaty rights retained by the Tribes on Treaty lands, must be immediately addressed for a more inclusive and comprehensive Fish and Wildlife lands forest habitat management strategy.

It is essential that the DNR stop logging upon Fish and Wildlife lands until each and every timber sale is first approved by the local Fish or Wildlife Manager. To date, the swapping rule still exists that if a stand is removed from consideration due to habitat reasons, another like stand must be selected for sale. This must change as must the timber cordage targets in place on Fish and Wildlife lands. Nothing in writing has been sent to DNR field offices making this change. Timber management plans should be developed for all Fish and Wildlife lands in coordination with FWS before undertaking logging activities to ensure the protection of habitat. This is an essential point that should be included as a specific change for the remainder of the STHI planning period. Current logging is de facto planning.

We urge you to take these concerns seriously and undertake immediate actions to rectify the existing flaws in the forest management plan. It is imperative to prioritize the conservation and sustainability of our forest ecosystem for the benefit of our environment and future generations.

(c) Activities conducted for the primary purpose of producing income.

(d) Activities, projects, or programs that promote or encourage opposition to the regulated taking of fish, hunting, or the trapping of wildlife.



Thank you for your attention to these critical matters, and we look forward to the implementation of necessary measures to address these concerns.

Sincerely,
Chandra

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