January 10, 2024

Midwest Regional Director Will Meeks U.S Fish and Wildlife Service 5600 American Blvd. West Suite 990 Bloomington, MN 55437-1458

Via email: will\_meeks@fws.gov

**Subject:** Transparency of Review of Minnesota Department of Natural

**Resources Timber Harvest Operations** 

Dear Director Meeks,

Congratulations on your new position with the U.S. Fish & Wildlife Service! We are hopeful that your years of prior experience and commitment to wildlife will benefit the Midwest Region. I am writing on behalf of Public Employees for Environmental Responsibility (PEER) to commend the FWS's recent actions to ensure proper use of Pittman Robertson funds allocated to the Strategic Timber Harvest Initiative (STHI) implemented by the Minnesota Department of Natural Resources (DNR). We also request that FWS ensure transparency and public participation in this review process that transcends minimum NEPA requirements.

As you know, the STHI, which aimed to enhance logging in Wildlife Management Areas (WMA), has raised significant concerns among wildlife management staff within the DNR. Reports from many field wildlife staff expressing alarm regarding the adverse impacts of the STHI on wildlife and older forests have highlighted the absence of an environmental assessment for this initiative, despite the utilization of federal Pittman Robertson Funds.

Recent employee surveys conducted by both PEER and DNR itself found that agency wildlife staff felt marginalized, and their concerns were ignored by DNR's forestry program. The U.S. Fish & Wildlife Service (FWS) requirements appear designed to empower DNR wildlife staff and ensure their suggestions will be incorporated into timber project planning.

As you are also no doubt aware, subsequent FWS field inspections indicated potential violations of Federal law and regulations of the Pittman Robertson Act and the National Environmental Policy Act (NEPA) by the DNR.

PEER applauds your actions to ensure that these logging operations conditions ensure the protection of wildlife and natural habitats, such as project-by-project pre-approval following site inspection and document review by both FWS and DNR wildlife staff.

We believe that both DNR and FWS and the environment would benefit from transparent public records of timber project documentation and witnessing site inspections. Public access to these steps will improve the accuracy of these official reviews and can be sequenced so that they do not require the expenditure of any official resources except public notice through electronic posting.

Public involvement in this project oversight will greatly help prevent the recurrence of problems beset by STHI.

We are very interested in meeting with you and hearing more about your hopes and plans for your new position. Please let us know when you have time.

Sincerely,

Chandra Rosenthal Rocky Mountain Director