



W.J. McCabe Chapter

January 29, 2002

Gaylord Paulson
Forest Planner
Division of Forestry
Dept. of Natural Resources
500 Lafayette Rd.
St. Paul, MN 55155

Dear Mr. Paulson:

Please except these comments by the W.J. McCabe (Duluth) Chapter of the Izaak Walton League on **Border Lakes Subsection Forest Resource Management Plan – Step 3.**

Desired Future Forest Composition (DFFC)

The goals and strategies in this section are a very good beginning toward restoration of the natural diversity of forest age and plant species composition in this sub-section. They move away from past practices of creating dense monocultures of same-aged aspen or conifer. We support this move. The goals for forest spatial patterns recognizes the need to maintain a range of forest patch sizes and structures on the landscape that more closely resembles the pattern of natural disturbance. We also support those goals and strategies. One goal highlights the need to identify upland brush cover types; we support this recognition of brush inclusions and cover types as habitat important for wildlife.

However, the plan is lacking in specifics about how these goals will be carried out. There are no detailed silvicultural recommendations or numerical objectives for implementation of the DFFC wildlife and biodiversity goals. The need for specifics for harvest treatments is especially important for the forest cover type composition, age composition and forest spatial patterns. The increase in upland conifers is certainly a needed change but the devil is in the details. Will this increase be accomplished by high-intensity plantation silviculture (planting in rows, herbicides, heavy equipment for site preparation, etc.) or will some gentler practices that incorporate natural site compositional diversity, underplanting and succession be utilized? Since harvest treatments are given numerical goals the outcomes of these treatments for wildlife and biodiversity also need to be similarly expressed. Silvicultural recommendation for both harvest and regeneration need to be explicitly given for the different forest types as part of the stand selection criteria.

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This plan is titled a “forest resource” plan. The use of the singular rather than the plural of “forest resources” is very telling. Although the definition of forest resources is given on p. 3.1, the paragraph does not indicate that this is a definition from statute (Chapter 89.001, subd. 8) and is therefore state policy. Missing in this plan are goals for other forest resources besides timber and forest vegetation, e.g. fish and wildlife habitat, recreation, aesthetics (scenery), water quality, and the sustainability of biodiversity.

Monitoring. The plan is silent on how monitoring will be carried out, and most importantly, on how the results of the harvest, on a yearly basis, will be reported to the public. This is absolutely crucial for determining if the DFFC goals are actually being achieved on the ground. How will the results of harvesting be measured besides the traditional way of reporting acres and amounts of timber outputs? Attention to this is necessary to give the DFFC diversity goals (age, composition, patches) some credence besides just words on paper.

Landscapes. Mention is made (p. 2.1) of the analysis of wildlife habitat needs that was done at the landscape level by Land Type Associations (LTA). The vegetative goals of the LTA’s are not given so it is difficult to understand what the future forest will look like in terms of spatial geography. How does the age, composition and spatial pattern of a particular landscape unit (LTA) influence how stands will be chosen for treatment? Landscape mixtures of different forest types, ages and patch sizes are very important for most wildlife species who find their habitat needs of food, cover and breeding sites in the heterogeneity of all spatial scales, from microhabitat features to patches (stands) to landscapes.

Riparian management. There is a good discussion of the need for most designated trout streams to have wider riparian management zones than the default values given in the MFRC’s guidelines handbook. The flexibility embedded in the Guidelines is also quoted: “acceptable to vary above or below recommended width and basal area guidelines”. However, the next step is not taken in this plan by stating how wide protective management zones for trout streams should be in varying geomorphic circumstances. A plan like this is the obvious place to provide some criteria. Instead, the issue of protecting water quality and quantity for fish is deflected to the field level where staff from wildlife, fisheries and ecological services will hammer out the recommendations on a site by site basis. This is highly inefficient use of staff resources. This decision seems to be based on a constant (and erroneous) reference to the guidelines as “standards” which they are not. They are only **guidelines**; standards, in contrast, are enforceable criteria for compliance. See p. 8, under Riparian Areas in the section on “Rationale for Guidelines” in the MFRC’s Voluntary Site-level Forest Management Guidelines; it gives the scientific basis for applying criteria in different circumstances. These criteria should have been part of this plan.

Old forests (Extended Rotation Forest – ERF). This section is very confusing and does not give an adequate definition of the difference between prescribed (designated) and effective ERF. Most people would not understand that prescribed ERF can be forest stands as young as ten years. Use of prescribed ERF as a management policy gives the

outcome in the table on p. 3.16 that clearly shows that over time the actual amount of old forest on the ground will decline drastically. This is not acceptable as a management goal. Many species depending on this habitat type require more than 6 to 10% of the forest for maintaining viable populations. Designated areas for ERF only makes sense where the geomorphology is stable (riparian corridors, for example). Otherwise, it is counter to scientific knowledge about how natural disturbance produces a heterogeneous mosaic of forest diversity in this Border Lakes subsection; the patches in that mosaic vary spatially over time. Harvest disturbance should replicate that process and move the old forest patches around the landscape. The DNR's approach to old forests is command and control zoning which cannot provide sufficient habitat over time because of random natural disturbances, harvesting and succession. The DNR needs to develop a more scientifically defensible approach to maintaining old forests over time rather than trying to prescribe stable forest patches in a dynamic landscape.

Habitat for game species. The only game species mentioned in this plan are deer and grouse (p. 2.8). That is done in the context of an assumption (false) that their habitat needs can be defined in a 1:1 correlation with the aggregate amount of aspen. This is a far too simplistic notion about habitat for these species. It should be obvious that in this sub-boreal landscape, conifers are important for cover for both species. It is not the total amount of aspen that is important but the patch size, age and configuration of habitat types, including aspen, that gives quality to their habitat. A 200 acre monoculture of aspen does not provide good habitat value for either species; neither does an 100 acre monoculture pine plantation. There are other game species, e. g. moose, spruce grouse, snowshoe hare, whose habitat needs are not the same as deer and grouse. This represents the need to provide wildlife habitat in the variability that is natural to this particular landscape to subsume requirements for all native species. Many of the DFFC goals and strategies do just that.

We would like to monitor the implementation of harvest practices that will fulfill the goals and strategies of the desired forest future condition for the Border Lakes subsection. Please advise us on how this can best be done.

Thank you for your time. We look forward to your response.

Sincerely,

Michael Furtman, for other members of the Conservation Committee
VP Conservation

January 31, 2002

Gaylord Paulson
Forest Planner
Division of Forestry
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500 Lafayette Rd.
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Dear Mr. Paulson:

Please consider this an addendum to the previous comments sent by the W.J. McCabe (Duluth) Chapter of the Izaak Walton League on **Border Lakes Subsection Forest Resource Management Plan – Step 3.**

Roads, Trails and Closures

The League is concerned about a proliferation of roads and trails that will occur with the increase in logging activity. We suggest there is a strong need to obliterate and naturalize logging roads after the harvest is complete. The state has not done much of this in the past, but needs to do more of it in the future, especially in wilder country such as the Border Lakes Subsection. It is particularly appropriate to require such an action in areas near or adjacent the Boundary Waters Canoe Area Wilderness, but it should be considered normal operating procedure on all timber sales.

Such post-logging remedial action is not that hard or expensive to do; it just needs to become a priority before the trails become a “traditional use area” by ATV/ 4-wheel enthusiasts. Removing those roads also helps protect fragile natural resources, such as easily impacted brook trout fisheries, as well as the experience of those user groups who seek solitude on these streams. Similarly, removal of these roads protects the backcountry experience of others such as hunters and hikers who are finding it increasingly difficult to enjoy a “big woods” experience.

We would also suggest that wherever possible, roads and trails be designed to the minimum standard necessary to protect the environment so that they are more easily obliterated. Many forest roads today become part of a de facto forest road system, even though they may only be used decades apart for true silvicultural reasons. This is not only expensive, but leads to diminished remote country recreational experience, fragments forest habitat, and is, in our opinion, one of the primary reasons many people object to logging – it isn't the harvest that so concerns them, but permanent “carving up” of once wild country.

Additionally, many of these roads are poorly maintained even though they may have been designed to Best Management Practice guidelines at the time of construction, leading to

environmental problems such as siltation from runoff. Finally, roads and trails left in place result in considerable acreage forever removed from forest production. Whether one is concerned with the loss of harvestable acres, or from the standpoint of loss of wildlife and plant habitat, restoring these acres to a wild condition benefits all.

For all these reasons, we strongly urge the DNR to consider the impacts of roads and trails, and to develop rigorous plans to decommission them post harvest.

Thank you for allowing me to add these comments to our previous submission.

Sincerely,

Michael Furtman, for other members of the Conservation Committee
VP Conservation