Aug. 21, 2019

Commissioner Sarah Strommen
MN Dept. of Natural Resources
500 Lafayette Road
St. Paul, MN 55155

Dear Commissioner Strommen:

The Izaak Walton League is closely following and is deeply concerned with internal/external DNR discussions recently publicized in various news outlets regarding forest habitat management on State Wildlife Management Areas (WMAs) and related implementation of the DNR's recently completed Sustainable Timber Harvest Analysis (STHA). We find the level and detail of concerns expressed by Wildlife field staff in regard to implementation of the STHA and related forest habitat management on WMAs to be unprecedented. We also have concerns with the content of the message delivered by your office to Wildlife field staff in regard to this matter. In particular, the Department's response letter and comments found in subsequent media interviews with Commissioner's staff have left us deeply concerned that the management of our WMAs is now being driven more by financial considerations (cords of timber harvested) than sound biological/ecological science that protects the broad spectrum of wildlife distributed across Minnesota.

The Ike's see three looming concerns, questions:

1. **State and Federal funding intent, integrity:** A significant portion of the state's 1.2 million acre WMA system has been acquired using state funds generated by Minnesota citizens through their purchase of a hunting license(s), and federal funding through the Wildlife Restoration Grant Program and related Pittman-Robertson Act (federal tax on firearms, ammunition, etc.). In essence, hunters and anglers are largely responsible for funding the purchase of a large portion of these WMA lands. WMA specific examples and concerns expressed by Wildlife field staff in regards to the 10-year stand exam/cut list recently generated by the STHA model/process, causes us to question whether this level of forest habitat manipulation (timber harvest) is consistent with their intended funding sources to maximize benefits for hunters, anglers, trappers, and others that utilize the aesthetic and recreational values of these WMAs.
2. **WMA system intent, enabling State statutes:** We are also concerned that the mandate to meet new, expanded timber (cord) targets using WMA lands and resources, may not meet the language and intended purpose of the State's WMA system, as per the following enabling legislation:

86A.05 CLASSIFICATION AND PURPOSES.

*Subdivision 1.**Classification**. The outdoor recreation system shall be comprised of units classified as follows, and each unit shall be authorized, established, and administered to accomplish the purpose and objectives of its classification.*

***Subd. 8.State wildlife management area; purpose; resource and site qualifications; administration**.*

(a) A state wildlife management area shall be established to protect those lands and waters which have a high potential for wildlife production and to develop and manage these lands and waters for

the production of wildlife, for public hunting, fishing, and trapping, and for other compatible outdoor recreational uses.

(b) No unit shall be authorized as a state wildlife management area unless its proposed location substantially satisfies the following criteria:

(1) includes appropriate wildlife lands and habitat, including but not limited to marsh or wetlands and the margins thereof, ponds, lakes, stream bottomlands, and uplands, which permit the propagation and management of a substantial population of the desired wildlife species; and

(2) includes an area large enough to ensure adequate wildlife management and regulation of the permitted recreational uses.

(c) State wildlife management areas shall be administered by the commissioner of natural resources in a manner which is consistent with the purposes of this subdivision to perpetuate, and if necessary, reestablish quality wildlife habitat for maximum production of a variety of wildlife species. Public hunting, fishing, trapping, and other uses shall be consistent with the limitations of the resource, including the need to preserve an adequate brood stock and prevent long-term habitat injury or excessive wildlife population reduction or increase. Physical development may provide access to the area but shall be so developed as to minimize intrusion on the natural environment.

We would point out that nothing in the enabling legislation mentions the extraction of forest products as a primary goal of our State's WMAs. In fact, the proposed levels of timber harvest may well be detrimental by removing necessary habitat components required for the broad suite of wildlife found on our WMAs, running counter to this enabling language.

3. **WMA management authority:** Wildlife population management and related habitat management on state WMAs falls historically and logically with the Division of Fish and Wildlife and related St. Paul, Regional, and Area/field staff. Manipulation of forest habitats on state WMAs through timber management is often a necessary and useful tool in wildlife habitat management. However, there is now open public concern about who is actually managing forest habitats on our State WMA's and for what purpose? Is the Division of Fish and Wildlife responsible for habitat management decisions, or has Forestry (at the behest of the timber industry) assumed management of forest habitats on Wildlife administered lands? Or, has a computer modeling supplanted field knowledge and made Wildlife staff as unnecessary as automobile drivers? We think not. It is local field knowledge that ought to be given the greatest weight in site-level decision-making, not an unknowing/unseeing computer program. Harvests on WMA's ought to be initiated by Wildlife staff, with timber output supplementing timber volumes coming off Forestry Administered lands. From where we sit, the tail (timber interests) is wagging the dog (wildlife, WMAs) under the new STHA.

Our support of and concerns about the STHA were expressed in an April 13th letter to former Commissioner Tom Landwehr (attached). As a conservation organization that considers itself a *"defender of soil, air, woods, waters, and wildlife*", we are troubled by the unprecedented concerns that have been expressed by Wildlife field staff and now backed by conservation organizations like ours. We respectfully ask that you and your management staff reconsider this issue in light of the funding sources, intended purpose of our WMAs, and State WMA management authority, concerns we have expressed in this letter. From our point of view, there is an outwards appearance of regulatory capture by the timber industry that now drives WMA habitat management.

For what it's worth, here are our recommendations that we feel can reassure the public that sound science is still valued:

1. State WMAs, and State Aquatic Management Areas as well, should be removed from the STHA process. The Division of Fish and Wildlife should draft and define an independent process that addresses forest habitat management needs (e.g. timber management) based on local and landscape-based wildlife population and habitat needs.

OR

2. Restore Wildlife staff's "aye or nay" within the WMAs during the STHA 10-year stand selection process.
3. Following stand selection (statewide), determine if the WMAs collectively have contributed approximately the volume needed to meet the STHA total cordage goal.
4. If the WMA's exceed the goal, allow the Wildlife section to pare back their proposed harvest plans. If the WMAs have not met total volume expectations, consider your alternatives. For example, does Parks and Trails, or Fisheries, already have plans that call for timber harvests that might contribute cords while meeting their desired habitat manipulations (like WMAs, we feel these lands should be left out of the traditional 10-year timber planning, and they should contribute only incidentally when trying to meet site-specific habitat goals.)
5. If these fail, think outside the box, and hire more foresters to assist with PFM timber sales. It's a recognized fact that the private sector no longer contributions a proportional amount of timber to the total market wood basket. Assisting non-industrial private landowners could help both the mills and Minnesota's rural landowners

Of these five points, bullet 1 is the most critical to accomplish. Restore WMA management decisions to wildlife staff and provide them the flexibility needed to help meet all or most of the Department's new STHA timber harvest target.

Thank you for your time and consideration.

Sincerely,

Ted Suss
MN Div. President
Izaak Walton League of America

Craig Sterle
MN Div. Past-President
Izaak Walton League of America

cc. Governor Tim Walz
Representative Rick Hansen – Chair, Environment and Natural Resources Finance Division Committee
Representative John Persell – Chair, Environment and Natural Resources Policy Committee

Senator Bill Ingebrigtsen – Chair, Environment and Natural Resources Finance Committee
Senator Carrie Ruud – Chair, Environment and Natural Resources Policy and Legacy Finance Committee
DNR Deputy Commissioner - Barb Naramore
DNR Division of Fish and Wildlife Director - David Olfelt
DNR Division of Forestry Director - Forrest Boe

April 13th, 2018

To: Tom Landwehr – MN DNR Commissioner

From: Craig Sterle – President MN Div. Of the Izaak Walton League of America

Subject: Proposed Timber Harvest Recommendations Based on the Sustainable Timber Harvest Analysis

Thank you for inviting representatives of the Izaak Walton League (Ikes) and other conservation organizations to meet with your staff on Wed. March 28th. As you know the Ikes have participated in and closely monitored the progress of the latest Sustainable Timber Harvest Analysis, conducted over the past year. This is by far a superior research study, utilizing the latest modeling technology available. The DNR staff and the consultants are to be commended. The various models took into consideration a spectrum of possible end products based upon a series of different desired harvest outcomes. This is indeed a powerful tool, and we hope that similar future studies employ improved versions of this technology.

This is not to say we totally agree with the Department, or the harvest level that the Department is now considering as sustainable for the next decade. Our objections are as follows:

- Ikes feel that the sustainable harvest level should be at or near 600,000 cords/year, rather than DNR's proposed level of 870,000 cords, with some flexibility to address severe insect mortality associated with larch bark beetles and emerald ash borers through salvage or a short-term level of unsustainable, accelerated harvest.
- We believe that the data shows that 600,000 cords/year would better represent a biological harvest level that leaves our forest more resilient to climate change, more attractive to recreational users, more aesthetically pleasing to the public, and better suited to provide habitat for a wide range of game and non-game species that depend on a diversity of timber species and with the presence of a well distributed acreage of older age-classes.
- The analysis models failed to address operability problems on lowland timber sites (40% of the DNR acreage) due to a trend of rapidly warming winter climate. While some consideration of this issue was given in the decision, we think your decision under-represents this problem.
- The models failed to address the need to consider/incorporate carbon sequestration as well as ecosystem services values.
- Industry has stated it is looking to drive down stumpage prices, negatively impacting both the School Trust Fund and non-industrial private woodland owners.
- Industry is pushing for an unsustainable harvest level (1,000,000 cords/year) from State DNR lands, while acknowledging that the non-industrial private lands are failing to supply anything close to their proportionate share of the wood for the market, and that lower prices from public lands will dis-incentivize timber sales and lock-in lower financial returns for private landowners.
- Industry has done little to solve procurement problems from private lands, like hiring more corporate PFM foresters, and instead are hoping to obtain wood using DNR's PFM program.

- Industry has systematically, and shortsightedly, sold off their once vast forest holdings, making them overly dependent on public and non-industrial woodlands

Let me now explain our objections in more detail. First, we feel the models failed to adequately consider several critically important factors. This includes impacts on sustainable harvest level resulting from climate change do to the long-term degradation of site operability in the State's lowland timber types (tamarack, black spruce, ash, lowland hardwoods, white cedar) which comprise approximately 40% of the DNR's timber volume. There is strong evidence that winters have become much warmer over the past 3-4 decades (see the Minnesota Conservation Volunteer – Jan.-Feb., 2018 "Seeing the Future" by Amanda Kueper, pg. 23 "Minnesota's average temperature has risen 2.5 to 3 degrees since 1970, and scientist project continued warming over the coming decades. The sharpest temperature climbs have occurred during Minnesota's infamously cold winters. We've see that winters are warming much faster than summer temperatures, says (Kenny) Blumenfeld, 'about 10 time faster than summer since 1970.' This is among the fastest rising temperatures in the lower 48 United States.") This is a factor the Ikes feel the consultants failed to receive proper direction on from the Department, and hence really underestimated (possibly because they were not familiar with our lowland soils and changing local weather conditions), and failed to properly evaluate it in the modeling.

Rationally speaking, winter logging on lowland sites is not going to suddenly stop. That said, if loggers are unable to access or operate on these bog sites, it's now questionable, and will soon be unacceptable, to include these lands in the harvest pool during management planning. As the winter harvest season incrementally shortens on both ends of the calendar, the economics become increasingly problematic for the logging community. Time and again over the past 25 years, loggers and Minnesota Forest Industries has had to press the DNR and/or the legislature for "special extensions" after winter logging conditions made it impossible to economically access State and County timber sales. As the Climatology Office has predicted, this issue is only going to get worse with the passage of time. How long the industry has until it's no longer worth the capital risk to buy lowland timber, nobody knows. That day is coming and probably sooner than we know.

So, by establishing harvest levels that fail to model the anticipated climate change over the coming decades, we believe this analysis has painted a far rosier picture than the economic realities. It is indeed a good thing that Forestry intends to repeat this exercise approximately every 10 years. This will allow the next study to have 10 more years of climate science behind them, and the models and study absolutely must incorporate these warming trends into all future sustainable timber harvest analysis.

In fact, we believe and would encourage that a more intensive look at all facets of climate impacts on timber harvest, including issues of operability, species composition, insect and disease amplification, impacts caused by invasive species, etc. be undertaken in conjunction with all subsequent SFRMP decisions on forest management.

Another area of concern is the rather blatant desire of industry to use increased State timber offerings to intentionally drive down stumpage rates. This is a self-serving proposition, harming both our School Trust Fund, which should instead be seeking maximum financial return for the Trust Fund (at least on a cost per cord basis), but also because lower prices act as a dis-incentive in the sale of private stumpage, by again driving down per cord market values. We recognize that private non-industrial lands are currently the very sector that is not contributing proportionally to the industry wood basket. Lower prices both dis-incentivizes private entry into the market, and will ensure over the planning period that this scenario stays locked in place.

During the later decades of the 1900s, the wood industry had two things going for them in terms of wood supply. They had large landholdings of their own that they could manage as intensively as they wanted, to produce a significant portion of their own needed stumpage. However, over the last 40 years, most companies have sold off vast acreages of corporate lands, including to name a few: Diamond, Potlatch, Champion, Consolidated, Louisiana-Pacific, and Boise. With the loss of control of these lands the industry became completely dependent on public and/or non-industrial private woodlands. And now, taxpayers and our public lands are being asked to bail out the industry. The sale of these landholdings was shortsighted on industry's part, this was their decision and which has consequences they are now having to deal with.

Secondly, knowing that there is an underutilized wood supply in non-industrial private lands, why isn't industry rapidly ramping up their own private forest management (PFM) program, one that exceeds what has already been asked of DNR? Up until 2008 there was such an industrial-PFM program (primarily focused on wood procurement). We ask, why has industry failed to mount their own self-serving private wood procurement program? Instead, they beat on the door of the DNR and ask that the public subsidize their procurement at hoped-for bargain basement price. All the while they are depriving private landowners of fair compensation for their wood. Where is our "free market economy" in this plan? We are not buying their reasoning. We would prefer that that industry step forward and employ their own PFM-procurement programs. They need to begin beating the bushes for the private timber that one-and-all knows is underutilized, instead of pushing DNR into unsustainable harvest levels off State lands, at reduced prices, and at a harvest rate that we consider unsustainable and risky to a healthy suite of flora and fauna.

Finally, there is an undervaluing of our forest resources at what we see as more sustainable level. The study did not consider the value of older forest retention for carbon sequestration, nor was a fair value calculated for the ecosystem services[1] provided at each harvest level. These oversights, or conscience decisions to not look at these values, inappropriately tips the sustainability equation towards that of the simple-to-calculate monetarized timber stumpage values. The DNR and other parties are then left without a fair representation of the true cost/benefits associated with the various model run scenarios. All of us are left making a best guess as to which model/harvest level is going to best support a sustainable balance between a healthy ecosystem, a strong recreational economy, and a strong forest industry.

Being that is the case, we believe that the proposed harvest level of 870,000 cords is just too high. Particularly when you add in the additional cordage associated with the "salvage" or enhance harvest of tamarack and ash over the next 10-year period. Again, we would suggest that a figure closer to 600,000 would better represent an acceptable, biologically sound harvest level, while still providing industry with a substantial portion of their wood needs. With the exception of salvage of insect killed/threatened tamarack and ash, all other species should be harvested at levels that lead to a harvest of no more than 600,000 cords.

We flat out reject the industry assertion that the sustainable harvest level is at or above 1,000,000 cords/year. This level of harvest would lead to far too many negative impacts, including impacts to species survival and distribution across the landscape, due to inadequate older age-classes. This harvest level would degrade recreational and aesthetic values, potential to negatively impact coldwater fisheries (possibly pushing many marginal streams beyond the thermal edge for sustainability during our increasingly warming summers), would lead to a loss of older timber that is increasingly counted on as a source of carbon sequestration in this era of rising CO2 levels, there would be a loss of important thermal cover for our critically stressed moose population, and much more.

While we are sensitive to the plight of industry and know they are an important facet of our state's economy, and that the logging industry is an important tool in managing our public and private lands, we also feel it is inappropriate to sacrifice the long-term sustainability of our public lands, at a time when non-industrial timber lands are being grossly underutilized. It is not the role of our public lands, nor the DNR's responsibility, to be the sole savior of the timber industry. Industry must take the initiative to hire more company PFM forester, and have these employees seek out willing private landowners that can help meet the industry's procurement needs, while at the same time helping private landowners properly manage their lands and receive a fair price for their wood. The private wood is there, and that's the wood that industry needs to chase down….not taking it off our sustainably managed State lands.

cc. Forrest Boe – Forestry Division Director
Craig Schmid – Forestry Deputy Director
Doug Tillma – Timber Sales Program Supervisor
Barb Naramore – Deputy Commissioner

[1] http://www.milleniniumassessment.org - UN Report: "*The Millennium Ecosystem Assessment" called for by United Nations Secretary-General Kofi Annan in 2000* that states in part:

Degradation and Unsustainable
Use of Ecosystem Services
Approximately 60% (15 out of 24) of the ecosystem services evaluated in this assessment (including 70% of regulating and cultural services) are being degraded or used unsustainably. [2] (See Table 1.) Ecosystem services that have been degraded over the past 50 years include capture fisheries, water supply, waste treatment and detoxification, water purification, natural hazard protection, regulation of air quality, regulation of regional and local climate, regulation of erosion, spiritual fulfillment, and aesthetic enjoyment.

And from page 6:
The total economic value associated with managing ecosystems more sustainably is often higher than the value associated with the conversion of the ecosystem through farming, clear-cut logging, or other intensive uses. Relatively few studies have compared the total economic value (including values of both marketed and nonmarketed ecosystem services) of ecosystems under alternate management regimes, but some of the studies that do exist have found that the benefit of managing the ecosystem more sustainably exceeded that of converting the ecosystem.

The impact of the loss of cultural services is particularly difficult to measure, but it is especially important for many people. Human cultures, knowledge systems, religions, and social interactions have been strongly influenced by ecosystems. A number of the MA sub-global assessments found that spiritual and cultural values of ecosystems were as important as other services for many local communities, both in developing countries (the importance of sacred groves of forest in India, for example) and industrial ones (the importance of urban parks, for instance).

The degradation of ecosystem services represents loss of a capital asset. [3] Both renewable resources such as ecosystem services and nonrenewable resources such as mineral deposits, some soil nutrients, and fossil fuels are capital assets. Yet traditional national accounts do not include measures of resource depletion or of the degradation of these resources. As a result, a country could cut its forests and deplete its fisheries, and this would show only as a positive gain in GDP (a measure of current economic well-being) without registering the corresponding decline in assets (wealth) that is the more appropriate measure of future economic wellbeing. Moreover, many ecosystem services (such as fresh water in aquifers and the use of the atmosphere as a sink for pollutants) are available freely to those who use them, and so again their degradation is not reflected in standard economic measures.