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Senate

State of Minnesota

SENATOR CARRIE RUUD
 District 4
 109 State Office Building
 100 Rev. Dr. Martin Luther King, Jr. Blvd.
 St. Paul, MN 55155

Phone: (651) 296-4913
 Fax: (651) 296-9441
 E-Mail: sen.carrie.ruud@senate.mn

September 9, 2003

Forest Plan Revision
 Chippewa National Forest
 200 Ash Avenue NW
 Cass Lake, MN 56633

Dear Sir or Madam:

During my first session as a State Senator, I was fortunate enough to become involved in many environmental issues. I was named to the Legislative Commission on Minnesota Resources, worked tirelessly on a bill that would provide for balanced, reasonable restrictions on off-highway vehicles, intervened in discussions of slot limits on Leech Lake, and many others. In doing this, I discovered how important Minnesota's natural resources are to the economy and the environment.

When I heard that the Chippewa National Forest would be changing their forest management plan, I began to do some research. I attended several meetings regarding this subject, including a community briefing in Bemidji. After looking over all the facts and the alternatives, I believe the best plan for the Chippewa National Forest in Alternative C, not Alternative E.

Alternative E will not provide enough harvestable timber to support the region's important forest industries. The forest provides employment for hundreds of people, and a reduction in the amount of harvestable timber will have a serious economic impact on a region that has already been hit hard by recession. Alternative E will reduce the amount of harvestable timber by a considerable amount. By reducing how much can be taken each year, the losses due to mortality will rise considerably.

Please reconsider this decision and support Alternative C. This alternative harvests about half of the forest's annual growth, provides more economic activity and establishes healthy and productive forest conditions.

Sincerely,

Senator Carrie Ruud
 District 4



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Minnesota Department of Natural Resources

OFFICE OF THE COMMISSIONER

500 Lafayette Road
St. Paul, Minnesota 55155-4037

September 8, 2003

Forest Plan Revision
Chippewa National Forest
200 Ash Avenue NW
Cass Lake, Minnesota 56633-8929

RE: Draft Revised Forest Plans and Draft Environmental Impact Statement
Chippewa and Superior National Forests

Dear Sir or Madam:

The Minnesota Department of Natural Resources (MDNR) has reviewed the above-referenced Draft Forest Plans and Draft Environmental Impact Statement (DEIS) and we offer the following comments. This cover letter contains several key points that we wish to emphasize. The multi-page attachment contains a more detailed explanation of these points in addition to several other comments both general and specific. Our comments are organized to facilitate your consideration and response. They are organized first by the document(s) they refer to and then by topic (e.g., wildlife, recreation). In general, our review concentrated more on the Forest Plans than the DEIS and the comments reflect this emphasis.

We wish to highlight the following issues for your special attention:

- We believe that the National Forests have the ability to support timber harvest volumes *fully up to the level* proposed in the Preferred Alternative, with due consideration of other forest goals and objectives. These objectives must include improved habitat conditions for species requiring early successional habitat, such as ruffed grouse and woodcock. Recent past practice has been for the Forest Service to harvest substantially less volume than the formerly defined target levels. This practice should change.
- Short-term, we feel the National Forests should implement a departure from the non-declining, even-flow approach and accommodate a more fluctuating flow in the management of their timber resource in the near term to provide more active harvest to address the current abundance of early successional forest types in older age-classes. This is important in order to address declining timber productivity and assure the ability to maintain the Preferred Alternative's desired amounts of early successional forest types.
- A more deliberate approach to preserving certain forest types and age classes is needed to mitigate the effects of timber harvest, as recommended in the Timber Harvest GEIS. This approach should include a modification in the Preferred Alternative to designate more potential Research Natural Areas (pRNA) and a network of old-growth "reserves."

DNR INFORMATION: 651-296-6157, 1-888-646-6367 (TTY: 651-296-5484, 1-800-657-3929) FAX: 651-296-4799

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Forest Plan Review
page 2

The proposed vegetation age class objectives, as proposed in the Preferred Alternative, will not, in our opinion, adequately protect old-growth forests.

- Goals for watershed protection, soil and forest productivity, invasive non-native species reduction and non-motorized recreation must be given equal consideration in the implementation of motorized trail and water access development under the Preferred Alternative.
- The Forest Service must continue to cooperate with the MDNR to provide timely and guaranteed access to state lands, state-owned mineral rights, and public waters.

The National Forests need to continue to actively contribute to the economic and social needs of rural Minnesota. We recognize first hand the difficulty in balancing values in forest management, but our future ability to manage forest stands for multiple benefits depends on the survival of a strong and diverse wood products industry in our state. Now is the time for the Forest Service to accelerate its forest management efforts to facilitate industry retention in the state while meeting landscape and habitat restoration goals. We believe that these timber management objectives can be met within the broader context of overall forest sustainability and adherence to the ecological and environmental goals that are also put forth in the plans.

We appreciate the opportunity for providing significant input to the management of Minnesota's National Forests through this Plan revision process. Improved coordination between agencies will be critical during the implementation of our respective plans and management activities. Please contact Don Buckhout (MDNR Environmental Review Section, 651-296-8212, Don.Buckhout@dnr.state.mn.us) if you have questions about these comments.

Sincerely,



Brad Moore
Assistant Commissioner for Operations

c: Tim Bremicker
Don Buckout
Mike Carroll
John Guenther
Mark Holsten
Gene Merriam
Ron Payer
Lee Pfannmuller
Paul Swenson
Cynthia Wheeler

MINNESOTA DEPARTMENT OF NATURAL RESOURCES
Detailed Comments on
DRAFT FOREST PLANS and DRAFT EIS
Chippewa and Superior National Forests

COMMENTS APPLICABLE TO BOTH PLANS AND DRAFT EIS

Timber Management

The DNR recognizes the legal mandates of the Forest Service to address habitat and species diversity standards and the professional choices made through your modeling efforts. At the same time, the economy of out-state Minnesota, and the wood fiber industry in particular, need a sustainable flow of high quality fiber from National Forest lands.

MDNR believes that the Forest Service can meet its environmental mandates and ecological goals and increase the contribution to local economies if it would implement the following on the Chippewa and Superior National Forests:

- Short-term, we feel the National Forests should consider a departure from the non-declining, even-flow approach and accommodate a more fluctuating flow in the management of their timber resource in the near term to provide more active harvest to address the current abundance of early successional forest types in older age-classes. This is important in order to address declining timber productivity and assure the ability to maintain the Preferred Alternative's desired amounts of early successional forest types.
- Deliver the backlog of wood not offered under the 1986 Chippewa National Forest Plan. The 1986 Plan established an ASQ of nearly 80 MMBF and the average amount actually harvested over the past decade has been only 65 MMBF. In the past several years, the amount harvested has declined even further.
- Implement as soon as possible large patch aspen and jack pine restoration efforts in both forests to create new large patches of early successional species, improve timber productivity, assure the ability to maintain the Plans' desired acres in these forest types, and improve habitat for game and non-game wildlife species.
- Properly fund and accelerate the program for multiple entry into mixed hardwood stands and spruce/fir complexes to increase stand diversity and tree health while reducing risks from forest insects and diseases.
- Continue and expand multiple stand entries to conifer plantations to improve diameter and fiber quality while increasing under story abundance and diversity.

Forest stand health and tree vigor will be improved and some fire hazard reduced; while protecting and, in some cases, improving the habitat value and diversity of treated stands. These efforts will provide additional fiber and high value products from National Forest lands that are greatly needed by Minnesota's rural economy today.

The Recreation Use in a Scenic Landscape Management Area (MA) direction does not include any statements about fuels management and reducing the risk/potential of catastrophic wildfires. Given that this MA includes much of the more heavily populated and high use areas, there

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should be some attention paid to the need for management activities, especially near structures and other high use areas, to reduce the risks to property and public safety from potentially damaging wildfires.

One key difference in the direction for the Longer Rotation MA compared to the General Forest MA is that there generally will be longer rotations. However, without some details on how much longer or what the rotation ages will be for the various forest types, it is difficult to determine the effects/potential impacts of these longer rotation ages. The lack of specific rotation ages or rotation age ranges in the General Forest MA also makes it difficult to determine how it compares with MDNR management direction.

The plans should do more to emphasize maintenance and development of white pine within stands and as a cover type. We recommend that the Plans include goals and measurable objectives for underplanting and other techniques to increase the white pine types and white pine presence in other types.

The following vegetation management objective could be a concern (e.g., fire risk, spread of insects/disease) depending on the extent and location of these representative areas. It should be quantified to the extent possible.

O-VG-12 Retain an adequate representation of naturally disturbed forest that is not salvaged such as burned, flooded, insect, or disease-killed, or blowdown areas. Maintain these in a variety of patch sizes and distributions on the landscape.

(“Proposed Forest Plan, Chippewa National Forest/Superior National Forest”, April 2003, p. 2-11)

We are concerned about reduction in the size and amount of large old patches under the Preferred Alternative. This alternative reduces the number of mature patch acres in the short term on both the National Forests and in the long term on the Superior. Moreover, Alternative E would result in 32% decrease in the acres in large mature forest patches on the Superior during the first two decades of the Plans (DEIS 3.2-60). This trend is troubling in light of the MFRC-DNR Spatial Analysis Project draft report, which shows that large old patches in the Northern Superior Uplands are currently markedly less common than they were historically. Likewise, few large young forest patches are produced under the Preferred Alternative E. In order to maintain large, old patches well in the future, it will be necessary to create large, young patches, especially for early successional forest types like aspen and jack pine. Given the extensive land managed by the National Forests, it will be difficult for other landowners to reverse the overall trend of increasing habitat fragmentation if the Forest Service adopts elements of Preferred Alternative E that lead to the reduction of large old patches and the creation of few large patches in the near future. Also, in the patch discussion, the Plans shouldn't lose the point that there is a need and desire for small, young patch management as well and provide some direction as to where that might take place (i.e., the General Forest MA direction places a heavy emphasis on large patch management).

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Wildlife Habitat

According to the DEIS the Preferred Alternative E may limit the ability to increase or maintain within-stand diversity (DEIS 3.2-38). Within-stand diversity in all forest types is of importance to a variety of wildlife species. Habitat requirements often occur at a sub-stand level and attempts to improve within-stand diversity can have a large impact on wildlife populations. The Plans should consider regeneration alternatives that do not limit within-stand diversity.

Strategies to retain aspen clones in non-aspen types and aspen types to be converted to other types need to be considered to help maintain or improve ruffed grouse habitat. A mixed conifer forest can provide good grouse habitat with densities rivaling those found in aspen, as long as aspen pockets and mature aspen are provided. We suggest that such consideration would aid within-stand diversity, mitigate the loss of aspen in converted stands, and maintain aspen where it exists in existing mixed species stands. This is very important in order to insure that the declining aspen type suggested in Alternative E does not lead to unacceptable declines in ruffed grouse populations.

Likewise, to help maintain white-tailed deer populations through severe winters, the Plans should consider increasing or maintaining within-stand diversity (e.g. clearcutting, partial cutting, selective cutting, browse management, prescribed fire) to provide browse in proximity to prime wintering areas.

We would like to see an expansion in the opportunity acreage available for the use of prescribed fire for site preparation and habitat enhancement. Doing so would lead to better within-stand composition and diversity and improve wildlife habitat.

We don't believe the Plans adequately assess or plan for upland brush or low-density upland tree types. We are concerned that many such existing stands may be targeted for conversion to other types. These types are often highly productive for wildlife species, including declining moose and woodcock, and we would like to see more consideration for them in the plans, including an assessment of their current condition and future goals.

We believe that open water wetlands, and water impoundments on the Chippewa, receive too little attention in the plans. They are a significant resource with benefits to many species and potentially of regional significance to migratory waterfowl, in particular ring-necked ducks, goldeneyes, and on the Superior, black ducks. It does not appear that this resource is adequately covered by any of the existing management indicators.

In addition to their use by a wide variety of wildlife species, wildlife openings serve as critical woodcock breeding habitat, and we are concerned about the long-term decline in breeding woodcock populations. A more thorough analysis of forest openings and their effects on woodcock populations by Alternative, including those created by timber harvest and naturally occurring forest openings, would have been helpful. We also believe that the Forest Service take into account the intent of local and statewide sportsmen's organizations in cases where their funds led to the creation or maintenance of wildlife openings.

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Access to Non-Federal Lands, Minerals, and Waters

The Preferred Alternative (and potential revisions) raises a number of concerns related to access to state lands, state-owned mineral rights, public waters, and public lands in general (e.g., for hunting/walking, OHVs).

The MDNR agrees with the transportation system desired conditions (D-TS-1 to 5), but we are concerned about the growing difficulty in obtaining special use road access permits to cross National Forest lands to access state lands for management. The time involved in obtaining these permits is hardly in keeping with providing a “seamless” interface with neighboring agencies. Acquiring special use road access permits becomes much more difficult and time consuming once existing roads are removed from the National Forest classified road system. Identification of roads for inclusion in the National Forest road system and decommissioning of roads/trails on National Forest lands need to be closely coordinated with the MDNR (and other intermingled landowners) to assure that the appropriate existing roads and road corridors are maintained. Decommissioning of roads could potentially lead to the opposite overall effect by requiring additional road building on other ownerships.

Designation of special management areas (e.g., pRNAs, SMCs, wilderness areas) and road decommissioning has the potential to affect MDNR resource managers’ ability to physically and administratively access some lakes. This has implications for fish stocking, survey flights, and motor use in lake/fisheries management. Designations of special management areas and decommissioning of roads need to be closely coordinated with the MDNR to identify and resolve potential conflicts prior to designation of special management areas.

DNR has a legal management responsibility related to state-owned minerals (including construction materials, quarry stone, and other bedrock metallic minerals). State and private mineral rights ownership exists below federally owned lands in both National Forests. We are concerned about how the Preferred Alternative affects access to current and potential sources of these materials, and our responsibilities related to mineral exploration and research. We believe the Plans and DEIS need to include more information about the projected effects on access to these resources for exploration, research, extraction, etc.

As noted in the previous section, addressing the growing demands for OHV trails will require clear and coordinated direction between the Forest Service, the MDNR and counties. As demands for motorized trails and the presence of machines increase, the potential demand for no- or limited-motor experiences also increases. In response, we suggest that the Forest Service consider expansion of the existing hunter walking trail system in cooperation with the MDNR and counties.

Old Growth

In June 1996, the MDNR sent a letter to the Supervisors of the Chippewa and Superior National Forests detailing our comments on proposed forest plan revision. In January 1997 we sent another letter commenting on *Reference Papers for the Forest Plan Need for Change*. In the 1996 letter we stated that old-growth forests should be given a high priority on both forests and that

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“what is usually considered “true” old growth is unmanaged: it is not created by silvicultural techniques. However, the development and maintenance of old-growth pine forests in the absence of natural fire regimes will require the management of stands with prescribed fire. This differs for so-called “managed old-growth” which should be addressed under the topic of “silvicultural prescriptions”.

In the 1997 letter, we reiterated a key element of our definition of old growth, stating that “remaining old-growth stands are relatively undisturbed by humans.” We also expressed a concern about the blurring of the distinction between management for certain old-growth characteristics and old growth itself.

Both forest plans focus on developing and maintaining some “old-growth forest conditions” rather than protecting the highest quality old-growth sites that have already been evaluated, scored and ranked by both National Forests. The DEIS (p3.2-40) describes management allocations under which “certain old-growth forest characteristics would be expected to develop and occur over time.” Under these allocations, only those old-growth stands included in the limited selections of pRNAs would provide for the full range of old-growth conditions under the Preferred Alternative.

We recommend that both National Forests designate a network of old-growth “reserves” in a manner similar to that recently completed by the MDNR. Because both National Forests have evaluated and ranked candidate old-growth stands using procedures developed by the MDNR, the process would be straightforward. More specifically, the Superior National Forest should protect the highest-ranking old-growth red pine and white pine forests, which are especially rare. The lack of such a network of old-growth sites will, according to the GEIS, increase the number and severity of significant (negative) impacts to Minnesota’s forests at all harvest levels (Jaakko Pöyry Consulting, 1994. Final Generic Environmental Impact Statement Study on Timber Harvesting and Forest Management in Minnesota, Executive Summary, p. iv).

Insect and Disease Management

Since the General Forest MA is the only MA that proposes to manage insect and disease outbreaks and protect investments to sustain productivity, the small amount of the National Forest in the General Forest MA raises additional concerns for adjacent landowners and the public, and brings into question the overall commitment of the National Forests to address timber productivity. The following desired condition statements would suggest a more active approach in addressing fuels and insects and diseases:

Insects, Diseases, and Disturbance Processes

Desired Condition

D-ID-1 Resource conditions exist that minimize undesirable occurrences of fire, insect, and disease outbreaks. When such impacts do occur, the healthy ecosystems are resilient and able to recover.

D-ID-4 Accumulations of natural and activity fuels are treated to enhance ecosystem resiliency and maintain desired fuel levels.

Public Health and Hazardous

Materials

Desired Conditions

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D-PH-1 Public and employee health and safety is of primary consideration while managing the National Forest.

(“Proposed Forest Plan, Chippewa National Forest/Superior National Forest”, April 2003, p. 2-9, 2-26)

The Preferred Alternative appears to be projecting forest conditions in the future that may increase the potential for a number of current insect and disease problems described at some length in the DEIS. For example, the DEIS analyzes the potential for spruce budworm infestations based primarily on existing mature spruce/fir types. However, strategies identified for Preferred Alternative E may increase the amount of fir in some areas, and as a result increase the risk of budworm problems. Similarly, the Preferred Alternative projects an increase in two-storied red and jack pine stands that will increase the risk of under story shoot blight diseases. The plans need to consider techniques that will reduce these risks, such as reducing the dominance of balsam fir and two-storied pine conditions in susceptible areas.

Research Natural Areas

The DEIS identifies an issue of “...how many RNAs [Research Natural Areas] ...are needed to provide for biodiversity and research opportunities while at the same time providing for consumptive uses” (page 3.7 – 10). This question is not answered in the DEIS. We recommend that a complete set of indicators relevant to forest-wide goals, desired conditions and objectives be used to measure the effects on this issue.

A document that we are familiar with that addresses this issue (U.S. Department of Agriculture, Forest Service. 2000. Potential Research Natural Areas - Superior National Forest - "Potential Pool of viable areas for consideration during forest plan revision.") states that “the Forest planning process will require further analysis on the [pRNA] pool through the alternative development process.” It goes on to list possible approaches and cites the potential for using an optimization model developed by the North Central Research Station “to display possible alternative approaches to RNA designation.” (Snyder, S. A., Tyrrell, L., and R.G. Haight. 1999. An optimization approach to selecting Research Natural Areas in national forests. Forest Science 45(3): 458-469.) However it is not clear which, if any, of these approaches was used.

We recommend that the DEIS document the process for determining pRNA land allocation in each Alternative, and analyze the effects of these allocations using all the indicators. For example, the DEIS does not analyze the forest-wide effects of establishing only some of the pRNAs for the Preferred Alternative E and three other Alternatives.

The DEIS also does not contain the specific criteria used to determine whether the goals of the Research Natural Area Program have been met by the Alternatives, making it difficult to evaluate whether any of the alternatives are designed to achieve the program goals. We recommend that in the DEIS, the Forest Service identify not only the general approach used to prioritize RNA land allocation by Alternative, but also to list the criteria by which Alternatives can be evaluated to determine the degree to which the goals of the RNA program were met in each Alternative.

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The DEIS recognizes 41 pRNAs that include 8 “Unique Areas” such that the actual number of pRNAs being considered totals 33 areas. However, the National Forest Plans place pRNAs and “Unique Areas” in different Management Areas. Since these two designations will be managed differently, the DEIS should clarify the actual number of pRNAs vs. “Unique Areas” in the pRNA pool.

The management status of pRNAs not designated should be clearly stated. Neither the DEIS nor the National Forest Plans identify any special management consideration for pRNAs that are not designated. The DEIS also does not address the effects of management on pRNAs not designated; an analysis of such effects is needed.

Selection and designation of an adequate number of pRNAs will help implement the GEIS recommendation to protect sensitive sites. See, for example, GEIS section “Recommended Strategies for mitigating significant impacts projected to occur at the base level of harvest (4.0 million cords per year): Landscape Level Responses: Protection of sensitive sites for plant species.” (Jaakko Pöyry Consulting, 1994. Final Generic Environmental Impact Statement Study on Timber Harvesting and Forest Management in Minnesota.)

Recreation

According to the Plans, Preferred Alternative E proposes more trail and water access development than any other alternative. We are concerned that the Plans do not address this potential development in the context of other important goals for watershed protection, soil and forest productivity, invasive non-native species reduction, and non-motorized recreation. We recommend that these goals be given equal consideration in your planning for future trail or water access development.

With regard to management of off-highway vehicle (OHV) use we are pleased that the Plans endorse an approach that appears to be consistent with our OHV management objectives and our rules and regulations for state forest lands. We are emphasizing a policy of managed use on managed trails and travel on designated trails only, with certain exceptions for cross-country travel during hunting and trapping seasons. The National Forest plans appear to be consistent with this policy. During the next few years, the MDNR will be designating many miles of OHV trails. Many of these routes will cross multiple ownerships, including, in some cases, Forest Service land. Issues regarding road use by OHVs and trail designation will require close coordination between our respective agencies.

The Preferred Alternative for both National Forests calls for up to 90 miles of new all-terrain vehicle trail to be built. The documents are not clear whether these are to be made up of one or more systems of new trail (totaling 90 miles) or if they will be 90 miles of largely connector trails linking existing roads to complete a system. This issue should be clarified.

Coordination

A desire to increase coordination between the Forest Service and MDNR staff on landscape level planning direction in general was noted. The Plans mention a core principle of coordination with

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state and local governments. If this principle is to be realized, we feel that local Forest Service officials must be directed to work with MDNR staff from all relevant disciplines on a regular basis. Doing so could improve the ability of both of our agencies to reach our respective goals. In particular, because of the difficulty of determining local landscape direction in the Plans, and therefore how to compare it with MDNR landscape direction, we suggest that additional coordination meetings between MDNR and Forest Service staff occur before the Plans are finalized.

The Plans should contain specific sections regarding the following coordination issues:

- project coordination with state/local agencies for any project on Forest Service lands where substantive state standards (e.g., involving endangered species or wetlands) may be involved; such as dams on waterways, linear facilities such as roads, pipeline corridors (e.g., the Enbridge pipeline), and other utilities;
- management of state listed endangered/threatened species; for example addressing the availability of survey information on rare species from the Forest Service for entry into the state Natural Heritage Information System;
- road/trail decommissioning decisions; which should be coordinated with other agencies including the MDNR so that existing and future needs for access will be fully considered in decisions;
- developing cooperative monitoring plans with the state and other agencies;
- motorized and non-motorized trail and access development; and
- maintaining and developing large forest patches across ownerships.

Forest Plan Clarity

We find that the presentation of Management Areas Directions and Landscape Ecosystem Objectives tends to obscure the future direction of the Plans. For example, relying on allocations to management areas contained in the draft plans can lead to an interpretation that the Preferred Alternative would result in a fairly dramatic increase in the amount of forest managed with an emphasis on longer rotation or older forest conditions, or is unsuitable for timber management (i.e., 2/3 of the SNF *outside* the BWCAW and 60% of the CNF). However, in looking at the Landscape Ecosystem Objectives and the DEIS analyses, reviewers (including the MDNR) get a very different picture of the future condition of the forests with resulting concerns that there will not be adequate representation and distribution of old forest outside of the BWCAW. It is difficult to provide useful, relevant comments when the future management direction is unclear or presented inconsistently.

COMMENTS SPECIFIC TO THE CHIPPEWA NATIONAL FOREST (CNF)

Forest-Wide Goals and Management Direction

- We would like to see a more explicit commitment to using native plants in watershed restoration projects.
- Under the Preferred Alternative E it appears that a large proportion of the CNF, including entire LTAs, would not have an old forest component. Given the importance of old

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forest conditions to a wide variety of wildlife species, we are concerned about the potential lack of these habitat conditions across wide areas of the forest, some of which had old forest historically.

- We would like to see Bear Island receive permanent protection for it is biological and cultural resources. We are not certain that Unique Area Status provides that kind of protection.
- There is a need to clarify why the Riparian Management Zone classification is not applied to some of the smaller lakes within the CNF.

Wildlife Habitat Management

The plan for impoundments on National Forest land was difficult to determine. Given their use by many wildlife species and potential regional importance to some waterfowl species, we suggest a cautious approach with any plans that may propose to eliminate any impoundments. We also suggest that the Forest Service consider the intent of donors to impoundment creation or maintenance in any such decisions.

Research Natural Areas

We are concerned with the paucity of new RNAs proposed under Alternative E for the CNF. Given that Sunken Lake was already being managed as an RNA, the Preferred Alternative E proposes only one new RNA on the entire forest. We believe that additional RNAs should be considered on the CNF.

COMMENTS SPECIFIC TO THE SUPERIOR NATIONAL FOREST (SNF)

Forest-wide Goals and Management Direction

We were encouraged to see that the land adjustment direction in much of the SNF is to consolidate land ownership patterns. The MDNR has a similar interest, even beyond the BWCAW issue.

The following vegetation management objective seems to contradict what is shown in table NSU-2 related to the projected or desired amount of the paper birch forest type:

O-VG-3 Maintain or slightly increase acres of birch vegetation communities.

("Proposed Forest Plan, Superior National Forest", April 2003, p. 2-11)

Wildlife Habitat Management

Minnesota's National Forests provide essential habitat for a variety of wildlife species that require forest interior and large patches of upland forest. The MDNR believes that these species are in need of special attention. In our forest planning process we are beginning to address maintenance of habitat for these species. Therefore, we are concerned that Preferred Alternative

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E is predicted to result in sustained decreases in habitat for these species on the SNF, increasing the risk to maintaining the viability of these species.

In the analysis of how the different Alternatives will affect various Management Indicators for the SNF (Chapter 3 of the DEIS), the Analysis Areas for most Management Indicators include the entire National Forest, including the BWCAW. The problem with this approach is that important habitats and habitat features are likely to be concentrated in the BWCAW and rare or uncommon elsewhere. We are particularly concerned that important habitat features, such as older forests dominated by hardwood and those dominated by conifers, not be concentrated in the Border Lake Subsection (i.e., mostly in the BWCAW) and uncommon in Subsections such as the Toimi Uplands or Nashwauk Uplands. We urge the Forest Service to consider the juxtaposition of important habitat components for species such as ruffed grouse.

Alternative E may also affect a variety of other species with fairly large home ranges that require appropriate juxtapositions of habitats. As an agency responsible for managing for all wildlife species, we are concerned about these implications. Therefore, we feel it important to consider the lands outside of the BWCA separately and suggest that the Forest Service attempt to provide an adequate diversity of habitat conditions throughout the National Forests.

We believe that moose are an important management indicator on the SNF whose habitat needs are not adequately analyzed or addressed through habitat provided for other indicator species. Moose were an indicator species in the last plan. The potential for future large patches to be concentrated in the BWCA could affect moose populations outside of the BWCA. Due to the high value placed on the presence of moose by wildlife observers, hunters, and others, we suggest more specific consideration for its habitat needs be included in the Plan.

We have some concern regarding intensive management of riparian habitat. Preferred Alternative E has a "moderate to relatively high level of regeneration-type timber harvest in riparian zones, due to harvest in and around wetlands." (Draft EIS, p. 3.3.3-4) We suggest modification of the Plan for riparian zones, with consideration given to less intensive timber management.

Research Natural Areas

We find that the Preferred Alternative E for the SNF will not achieve the goals of the RNA program as defined by the Superior National Forest, which are "to provide a network of National Forest Lands that are designated to serve as ecological areas for research, monitoring, education, and to assist with maintenance of biological diversity." (U.S. Department of Agriculture, Forest Service. 2000. Potential Research Natural Areas - Superior National Forest - "Potential Pool of viable areas for consideration during forest plan revision". 157 pp. On file with: Forest Supervisor, Superior National Forest, 8901 Grand Ave. Place, Duluth, MN 55808) In order to meet that goal it will be necessary to represent viable examples of each vegetation Alliance as described in Snow *et al.* 1998.

When we evaluated the representation of high quality examples of Alliances (i.e., AB rank) for the pRNAs proposed in the Preferred Alternative as in the SNF's pRNA Analysis (US

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Department of Agriculture, Forest Service. 2000, *op cit.*), we found major gaps in all subsections, even when RNA equivalents (e.g., state SNAs and the BWCAW) were included. Highly ranked examples of some rare Alliances were missing altogether, whereas several other widespread alliances were very poorly represented. For example, the Eastern White Cedar-Yellow Birch Forest Alliance, which is found in the North Shore Highlands, is not represented in Alternative E. This Alliance is recognized by NatureServe as a globally imperiled community (G2-G3). That omission could be remedied by adding a pRNA that represents this Alliance such as Pearl Lake Hardwoods. Other widespread Alliances such as the Red Oak – Sugar Maple – (White Oak) Forest Alliance in the Nashauk Uplands are poorly represented with just one example in one subsection under Preferred Alternative.

The Preferred Alternative also misses opportunities for the SNF to cooperate with the MDNR in recommending designation of two pRNAs that are immediately adjacent to state Scientific and Natural Areas. Kawishiwi Pines pRNA abuts the MDNR's Kawishiwi Pines SNA and represents the White Pine Alliance, an Alliance that is rare in the BWCAW and usually present as linear stands along lakeshores. Lutsen SNA Addition pRNA is contiguous with the MDNR's Lutsen SNA and includes a rare north-facing white cedar stand. Recommendation of these two sites would significantly increase the effective size of the existing SNA.

In order to meet the SNF's goals for its RNA program, we suggest that the Forest Service should increase the number of pRNAs that will be designated as RNAs, including the Pearl Lake pRNA. Not only would this approach be a big step towards meeting the Superior National Forest's RNA goal, but also it would also further the mitigation strategy for protection of sensitive sites recommended in the Generic Environmental Impact Statement Study on Timber Harvesting and Forest Management in Minnesota (Jaakko Pöyry Consulting. 1994. Final Generic Environmental Impact Statement Study on Timber Harvesting and Forest Management in Minnesota). That strategy states that "rare plant species and rare plant communities... that are likely to be sensitive to harvesting impacts should be excluded from harvest." This GEIS then points out that some sensitive sites currently receive protection as RNAs. However, since the publication of the GEIS in 1994, very few acres of sensitive plant communities have been protected in the forests of northern Minnesota.

The SNF Plan does not include a timeline for formal designation of pRNAs selected. Noting that the Lake Agnes pRNA was first identified as an RNA candidate in the 1986 National Forest Plan, a timetable should be included in the Plan to facilitate monitoring and implementation.