



January 4, 2018

Sustainable Timber Harvest Analysis Project
Minnesota Department of Natural Resources
500 Lafayette Road
St. Paul, MN 55155

RE: Minnesota Department of Natural Resources (DNR) Draft Sustainable Timber Harvest Analysis

Dear DNR Sustainable Timber Harvest Analysis Project Leaders:

The Minnesota Chapter of The Wildlife Society (MNTWS) thanks you for the opportunity to provide comments on a Sustainable Timber Harvest Analysis (STHA) that considers all forest resources and values, including wildlife habitat and biodiversity, for the long-term benefits they provide to Minnesota citizens. We are a non-profit professional society of scientists, managers, educators, students, technicians, planners, consultants and others who use science-based management and conservation to help sustain wildlife populations and habitats. Our guiding policies include supporting and promoting conservation of biological diversity, not only for wildlife but because human quality of life and survival depend upon it, opposing activities that jeopardize threatened and endangered species populations, and supporting restoration of critical habitats.

DNR-administered forest lands provide habitat for hundreds of native wildlife species, including over 100 species in greatest conservation need, as noted in DNR's Minnesota Wildlife Action Plan 2015-2025. These lands, and the habitat and wildlife they support, are instrumental in supporting a thriving outdoor recreation and ecotourism industry in our state, which keeps people connected to the land and supportive of natural resource conservation.

MNTWS supports and is very appreciative of DNR's STHA effort. It is a significant opportunity to reassess and guide management of DNR-administered forest lands, especially in the context of new and expected stressors on them, and new plans such as DNR's Minnesota Wildlife Action Plan 2015-2025 and Minnesota Forest Action Plan Update, National Priorities Section, 2015 Addendum.

To most effectively and efficiently sustain wildlife habitat and biodiversity, manage forest ecosystems, and serve Minnesota citizen's in the long term, MNTWS supports:


- **Scenarios 2.2, 2.3 and 1.2.4.2.** Based on the current draft analysis options and information, these scenarios are the most beneficial to wildlife habitat, and provision of older forest.
- **The statement that "maintaining current harvest levels, or increasing above current harvest levels (800,000 cords per year), would impact the agency's ability to move the forest toward goals for biodiversity and habitat for both young and old forest dependent wildlife."**
- **An analysis that places equal importance on non-timber values and all forest ecosystem services, as strived for in DNR Section Forest Resource Management Plans and National Forest Resource Plans (i.e., a "Sustainable Forest Resource Management Analysis"), rather than an analysis driven by timber harvest volume.**

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- **Development of additional scenarios** that give greater consideration to old forest, current management and climate change.
- **Analysis that fully considers the context of current and expected stressors on DNR-administered forest lands**, such as conversion, development such as roads and urban sprawl, fragmentation, insects and disease, invasive species and climate change.
- **Consideration of the cumulative impact of these stressors on DNR-administered forests.** If not monitored and kept in check, old forest habitat will continue to be eroded and rare wildlife populations and features continue to decline. Increased harvest would exacerbate decline of old forest dependent species. Listing of wildlife species on state and federal protection lists would be hastened, ironically limiting timber harvest within forest designated Critical Habitat.
- **Recommendation of a monitoring, evaluation, adaptive management program** in the analysis for incorporation in the selected harvest level and subsequent management.
- **Retention of adequate residual or leave trees during harvest**, as recommended in MFRC forest management guidelines and required on DNR-administered forests.
- **Incorporation of effective roads-trails closure/obliteration practices on temporary roads** following harvest to minimize negative impacts to wildlife, prevent road creep and maintain wildness.
- **Management of Wildlife Management Areas that is driven by wildlife habitat needs**, as well as hunting, trapping, fishing, and wildlife watching.
- **Coordination of DNR with other forest landowners/administrators in landscape level planning to manage forest resources, such as older forest and its distribution, across ownerships.** Many wildlife have large home ranges, and habitat needs must be met repeatedly across landscapes to sustain populations. Active participation in Minnesota Forest Resource Council landscape committees is one effective avenue for this coordination.

Please read the attached Background Resource Report that discusses the rationale, references and supporting information to our comments.

We would appreciate the opportunity to meet to discuss our comments. Thank you for considering them, and working to develop and use an analysis that considers all forest resources and values for the long term benefits they provide Minnesota citizens. Please contact me if further information is needed or questions arise.

Sincerely, 
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Attached: MNTWS Resource Background Report to Comment Letter on draft STHA

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