



September 19, 2024

Director  
Ecosystem Management Coordination  
USDA Forest Service  
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**Document citation: Draft Environmental Impact Statement for Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System.**

To Ms. Linda Walker:

The Minnesota Department of Natural Resources (MNDNR) appreciates the opportunity to respond to the United States Department of Agriculture (USDA) Forest Service's (USFS's) draft environmental impact statement (EIS) to amend land management plans for National Forest System units to address old-growth forests (USFS Old Growth Direction).

The MNDNR's mission is to work with Minnesotans to conserve and manage the state's natural resources, to provide outdoor recreation opportunities, and to provide for commercial uses of natural resources in a way that creates a sustainable quality of life. MNDNR-managed forest lands have been third-party certified by both the Forest Stewardship Council (FSC) and the Sustainable Forest Initiative (SFI) since 2005, a sign of our dedication to sustainable and responsible forest management. Conserving old growth forests and their unique ecosystem services is an integral part of MNDNR's commitment to sustainable forest management.

The MNDNR developed its first management policy on old growth forests in 1994, following extensive stakeholder engagement. Today we manage about 45,000 acres of old growth forests located on various types of management units on state land, including State Forests, Wildlife Management Areas, Aquatic Management Areas, State Parks, State Recreation Areas, and Scientific and Natural Areas. We also have a monitoring program that assesses the ongoing status of our old growth forests and informs on-the-ground management, policy, and land use decision-making.

The MNDNR closely coordinates with other forested landowners in Minnesota, including the USFS. We have a significant interest in seeing that the land management plans for the Chippewa and Superior National Forests – both in Minnesota – are written and implemented in a way that effectively protects and manages old growth forests in Minnesota. The evolving challenges in managing threats to old growth forests (i.e., wildfire, insects, disease, climate change) underscore the importance of maintaining a strong partnership between our agencies to ensure effective management for the health and resilience of the nation's and Minnesota's forests.

In this spirit of collaboration and advancing shared goals, we offer the following specific comments and concerns regarding the draft environmental impact statement on the USFS's Old Growth Direction for your consideration.

- **Among the four alternatives presented in the draft EIS, the proposed approach (Alternative 2) most closely aligns with MNDNR’s approach to protecting and managing old growth forests on state lands.** A consistent approach to old growth forest management across state and federal lands in Minnesota benefits both our agencies. Please contact us if a copy of the MNDNR’s recently updated Old Growth Forest Policy would be beneficial. The following table describes some of MNDNR’s key policy provisions, along with recommendations for the USFS Old Growth Direction:

Provision in MNDNR’s Policy for Old Growth	Suggestion for USFS Old Growth Direction
<p>Old growth is defined as a late successional forest that has developed over a long period of time, essentially free from stand-replacing disturbances. These forests have relatively large, old trees of long-lived species, many snags, downed logs, and have ongoing small-scale disturbances and tree mortality. Minnesota has many forest types that can develop into old growth forest communities, but forests dominated by relatively short-lived, shade-intolerant species such as aspen, birch, and jack pine do not fit this definition.</p>	<p>We support the recognition that old growth definitions are regionally specific (Standard 1) and that not all forest types have the ecological capacity to reach an old growth forest development stage (Standard 2.c.vi).</p>
<p>The MNDNR manages its old growth forest stands to ensure the quality is maintained or improved over time and the old growth forest network has the acreage necessary to meet the following goals: 1) Represent old growth forest types as an element of the state’s biodiversity, 2) Provide some of the habitat needed for wildlife and plants associated with old forests, 3) Maintain old growth forest stands as examples of natural processes, and 4) Provide visitors the opportunity to enjoy old growth forests now and in the future.</p>	<p>We suggest modifying the language in Objective 4 to focus more on maintaining or improving the quality of old growth forests at appropriate amounts “as determined through stakeholder consultation.” This would help ensure that the benefits from old growth forests are realized while minimizing unintended negative social, economic, or cultural impacts. The wide range of estimated acres of old growth under a 95% confidence interval (Table 22-1, Draft Ecological Impacts Analysis Report) underscores the value that stakeholder consultation could bring to quantifying the appropriate acreage of old growth. The goal of an “increasing trend toward appropriate amounts” is vague and needs clarification.</p>
<p>Generally, management activities within MNDNR old growth forests must strive to maintain the values and ecological integrity of the old growth forest while adhering to other state/federal laws and policies. For example, prescribed burning and invasive species treatments are allowed. Timber harvest is allowed in limited cases like removing invasive species or hazard tree removal for public safety. Access into and across old growth is allowed provided that impact minimization measures are applied as follows: first try to avoid, then use existing routes, with the last resort being the creation of a temporary access route. Mineral management is allowed when aligned with state statutes and rules.</p>	<p>We support Alternative 2’s proactive management approach. We agree with the analysis that proactive management will most efficiently produce desired conditions. Our experience protecting and managing old growth forest informs our support of retaining all management tools to steward old growth.</p>

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<p>Old growth forest stands are dynamic and constantly changing due to natural succession and disturbance events. As such, MNDNR allows for small adjustments (additions and removals) to the old growth forest network in specific circumstances to maintain adequate acreage to meet the goals stated above and to maintain or improve the quality of the old growth forest network over time. We do not expect to undertake any new, extensive designation efforts after completing our <a href="#">lowland conifer old growth</a> designation project.</p>	<p>We suggest adding language to Management Approach 1.b to reflect that future old growth forest can be managed “To replace forests that no longer meet the definition of old growth because of stand-replacing natural disturbance events.” MNDNR’s own experience in managing old growth shows that protecting and stewarding old growth forests is not accomplished by a one-time planning effort.</p> <p>We suggest adding an exception to Standard 2.b highlighting that cutting or removing trees in old growth forest for purposes other than proactive stewardship is permitted when “(3) through stand-replacing disturbance events the stand no longer meets the definitions of old growth.” This language would help capture the dynamic nature of old growth stands and ensure sound resource use when stands no longer meet the definition of old growth. For instance, the MNDNR has allowed timber harvest on old growth stands severely impacted by wind (blowdown) events.</p>
<p>Monitoring is required to 1) assess the extent to which the composition, quality, acreage, and other characteristics of the statewide old growth forest network are changing over time, and to 2) identify site-level management needs within the old growth forest network and track their implementation. This supports our adaptive strategy for managing old growth over time.</p>	<p>We agree with the inclusion of Plan Monitoring 2 (NOGA-FW-PM-02) and support the strategy to produce Biennial Monitoring Evaluation Reports to support the Adaptive Strategy for Old Growth Forest Conservation. We appreciate the recognition that fine-scale information needs will require identifying external partnerships, and we encourage USFS to collaborate with MNDNR on this aspect. We are actively developing a protocol that <a href="#">couples on-the-ground data with remotely sensed data to monitor old growth forest</a>.</p>

- **We request that USFS avoid or minimize impacts on state operations.** MNDNR needs to maintain existing access to state-owned mineral and surface ownership. Using existing access routes or creating temporary accesses through old growth forests is essential to conducting emergency (wildfire) response and facilitating forest and minerals management on state lands. In light of this, we request the following:
  - We suggest revising Management Approach 1.a.iii to read “provide geographically relevant information about threats, stressors, and management opportunities relevant to the ecosystem of the plan area to facilitate effective implementation *and avoid or minimize management impacts to non-federal land.*”
  - Please clarify how Guideline 3 will potentially impact state operations. We suggest adopting language similar to the MNDNR’s Legacy Tree Policy which is informed by guidance in FSC certification ([Indicator 6.3.f](#)) to identify and protect existing legacy trees.
  - Please clarify how the amendment may impact existing and planned Good Neighbor Authority (GNA) projects. We request that the USFS avoid or minimize impacts to ongoing GNA projects.
  - Please add language to Standard 2.c to specify that vegetation management actions or incidental tree-cutting or removal are allowed “for site access to non-federal land provided that impact minimization measures are applied.”
- **We request continued engagement on any amendments to the Superior and Chippewa National Forest land management plans.** In particular, we request early and active engagement in defining old growth characteristics and spatial planning to identify appropriate locations and amounts of old growth forest on the landscape. MNDNR has a wealth of relevant place-based knowledge and experience managing old growth forests in Minnesota to contribute to these two National Forest planning processes. We note the following:
  - MNDNR has experience in defining Minnesota-specific old growth forest types and determining appropriate amounts of old growth to conserve and steward. While many types of old growth forest are underrepresented on the landscape, Minnesota has abundant lowland conifer old growth forest (classified as “sub-boreal spruce/fir” in USFS definitions). We can share our past and existing work in this space to facilitate USFS progress towards Desired Condition 1 (appropriate amount of old growth).
  - MNDNR protects old growth forests from edge effects of wind, sun, invading edge species, and disruptions to hydrologic function by managing adjacent lands using limited harvest buffers and harvest scheduling tools. We request engagement as Superior and Chippewa National Forest land management plan amendments are developed and suggest that USFS consider [MNDNR’s forest inventory old growth spatial layer](#). Collaborative landscape-level planning will allow us to evaluate the potential impacts of National Forest land management plans on MNDNR’s old growth network and vice versa.

Finally, if USFS has specific expectations from MNDNR as a partner in stewarding the old growth forests of Minnesota, we respectfully request more information about those expectations. The MNDNR administers nearly 2,000 acres of state-owned, designated old growth forest within the boundaries of the Chippewa National Forest and over 10,000 acres within the Superior National Forest. We recognize there may be opportunities to collaborate on the management of stands adjacent to either MNDNR or USFS old growth and request early engagement in the planning process.

Thank you again for the opportunity to comment on the draft environmental impact statement for the USFS's Old Growth Direction. We welcome further discussion on the comments and concerns raised in this letter as we work together on our shared goal of conserving old growth forests and their unique ecosystem services.

Sincerely,

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