7 July, 2023

Chippewa National Forest
ATTN: Winnie Sand Project
1235 Division Street
Deer River, MN 56636

SUBJECT: RGS & AWS Public Comments for Winnie Sand Resource Management Project

Dear Ben Benoit,

Established in 1961, RGS is North America's foremost conservation organization dedicated to creating healthy forests, abundant wildlife and promoting a conservation ethic. Together with AWS (established in 2014), RGS works with government agencies, private land owners, and partners to develop critical wildlife habitat utilizing scientific management practices and principles. As such, I am writing this letter on behalf of the RGS & AWS to provide comments on the **Winnie Sand Project** on the Deer River and Blackduck Ranger Districts of the Chippewa National Forest.

RGS & AWS are overall, in support of the proposed project. We are in support of the level and extent of wildlife habitat and active forest management which includes timber harvesting and feel these activities will move the Chippewa National Forest closer to meeting its Forest Land and Resource Management Plan (Forest Plan). However, we have several questions and concerns around some of the specific practices, Desired Vegetation Conditions (DVC), and the benefits and intent of DVC as it pertains to the Leech Lake Band of Ojibwe (LLBO) 2019 Memorandum of Understanding (MOU) and supporting co-management documents with the Chippewa National Forest.

Balancing Prescribed Burning with Commercial Timber Harvesting

RGS & AWS support the Forest Service's leverage of their MOU with the LLBO to implement prescribed burning as an ecological process within the project area. There is ample scientific, and ecological evidence to suggest that fire was historically and culturally an important component of this area of forest. We support the planned use of prescribed fire in the project area especially in association with planned timber harvesting activities in the Winnie Sand Project area. We also understand and support using timber harvesting as a tool to advance management and prepare multiple project areas for prescribed fire by reducing tree density, fuel loading, and opening forest canopies so that light may influence the growth of understory vegetation. However, we are concerned about what we are interpreting as a reliance on only the use of prescribed fire after restoration activities have begun with the use of timber harvesting. Speaking as a professional who has worked in the intense study and implementation of ecological restoration practices in mixed pine ecosystems through the use of timber harvesting and prescribed burning in the Great Lakes Region for the past 10 years, there is a perception that fire can fully replace timber harvesting to maintain ecosystems under current conditions. This simply is not the case for the restoration of red pine ecosystems that haven't seen fire for decades. Through studying the effects of spring, summer, and fall prescribed burns on a 1, 2, and 3-year return intervals in forests that received various density thinning treatments prior, I can

say that stands may still require regular timber harvesting entries to maintain DVC. Especially if target fire line intensity or fire return intervals cannot be reached due to environmental factors. Planning future timber harvesting off of fire effects monitoring protocols and regular forest inventory beyond the initial reduction of forest canopy should be considered to manage canopy cover. It is for these reasons, RGS and AWS request clarity over the intended future use of timber harvesting within the Winnie Sand project area and a clear pathway to ensuring that commercial timber harvesting will continue to take place as a restoration and management tool. As Forest Conservation Director for RGS & AWS in the Great Lakes Region, I am happy to lead discussions with leading Wildland Fire Ecologists from the region and host Chippewa National Forest Service staff and LLBO partners on visits to the Treehaven Fire Plots in Wisconsin where a 10-year long replicate fire study project is taking place in red pine ecosystems. I am happy to facilitate discussion about fire as a process in red pine ecosystems and discuss lessons learned towards reaching similar desired future outcomes.

Being that the Leech Lake Indian Reservation and the Chippewa National Forest share almost 2,000 miles of boundary and 44% of the Chippewa National Forest lies within the Leech Lake Indian Reservation, RGS & AWS acknowledge the complexities of this project. We acknowledge the unique legal history as the foundational relationship between the Band and the Chippewa National Forest and how the sharing of this boundary directly links the National Forest with the social, economic, and cultural well-being of the Leech Lake Band of Ojibwe. However, the 2019 MOU acknowledges that: “Unique in the National Forest System, the Chippewa National Forest was the first national forest created by statute and the only national forest created with provisions for the benefit of both the general public and American Indians”. Maintaining commercial timber harvesting as a tool for the restoration of the Winnie Sand Project area not only helps to continue to drive restoration activities for the benefit of tribal members, but it helps to support the well-being of all northern Minnesota communities in-line with the 2019 MOU, statutory authority, and supporting co-management documentation.

Reduction of Aspen within the Project Area through DVC-6

RGS & AWS support the implementation of the Chippewa Forest Plan. While the Forest plan calls for a reduction of aspen, we have some concern that forest data may be out of date and these reduction targets may already be being met through natural succession and conversion to other forest types. RGS & AWS note that aspen does hold an ecologically appropriate and important place on this landscape and want to make sure that it’s presence is not reduced beyond that which is identified in the Forest plan, NRV, and HRV.

There are exceedingly older aspen cohorts on the Chippewa National Forest. We are concerned that many current stands of aspen in the 60+ year old age-class were typed so over 10+ years ago. Due to inactivity and lack of timber harvesting in these stands over the past 10+ years, as well as the age of current forest data, much of that aspen may have already fallen out or below stocking levels where if harvesting were to take place today, they may effectively fail to regenerate to an aspen cover type. We feel that much of those formerly assessed stands will only regenerate to contain aspen components or no aspen at all at this stage. We believe there needs to be a more accurate assessment of existing aspen stands to determine if the Chippewa National Forest is already meeting or exceeding its Forest Plan goals to reduce the aspen cover type before fully moving forward with aspen reduction goals as part of this project.

In addition, we believe maintaining aspen as a component of planned future pine management through the use of timber harvesting and prescribed fire is important for wildlife habitat and fits within the Natural Range of Variation (NRV) as well as Historical Range of Variation (HRV) on the Chippewa National Forest. Aspen and young forest as a component of this landscape prior to wide-spread European settlement and timber harvesting has been well documented. Explorers Owen, Leidy, and Norwood made the following observation in 1848 near this exact project area: "The land at the outlet of Lake Winibigoshish is sandy, with a tolerably good soil. There is a large proportion of hard woods in all this section…. that when the Conifers are burnt off, a growth of oak, maple, ash, aspen, and birch, springs up." This observation was made almost a century prior to the cession of fire and decades before the original cut-over of this project area and indicates aspen as a component of a relatively diverse landscape.

Maintaining aspen as a stand component of fire managed red pine stands is an achievable objective, as other red pine fire projects have found. Doing so will help to maintain portions of important deciduous young forest habitat within conifer stands for wildlife, as well as maintaining an important timber product component.

Photo from the Treehaven Fire Plot study area (WI) that has received annual burning since 2014 (including a summer burn in 2023) and maintains an aspen component. Single stem visible in foreground while a

younger pocket is visible in the background. Traditional Ecological Knowledge (TEK) is valuable in establishing a baseline justification for fire as a natural process. However, aspens role and function within fire-maintained ecosystems is not well understood by TEK or Scientific Ecological Knowledge (SEK). Arbitrarily removing and suppressing aspen via commercial timber harvesting and/or mastication within fire managed landscapes before SEK studies can be conducted may lead to stands that are less diverse, poorer wildlife habitat, and outside the NRV and HRV.

Defining Old Growth as it pertains to DVC-1

RGS & AWS have concerns about the consistency in the use and intended definition of the term "Old Growth" as it pertains to DVC-1 (Increase blocks of ecologically functioning old growth stands) within the Winnie Sand Project as well as the Forest Service MOU with the LLBO. Leading up to this project, the term old growth has been used in both the 2019 MOU and the Desired Vegetative Conditions Implementation Guide: A Joint Working Document Between the Leech Lake Band of Ojibwe Division of Resource Management and the Chippewa National Forest. However, in these supporting documents, the term "Old Growth" has been used alongside other terms or objectives that may have slightly different interpretations, such as: "furthering Old Growth Characteristics", "expansion of older age class conditions", or implementing "Extended Rotation Management" as part of the Desired Vegetative Conditions. The Conifer Specific Stand Level Implementation Standards of the Desired Vegetative Conditions Implementation Guide, indicates the use of Extended Rotation Management and Conifer harvest and thinning standards, specifically:

> iii. Promote extended rotations in long-lived conifer species, thinning at multiple entries that allow for increased diversity over time, extending rotation ages to >=200yrs.
> iv. During conifer harvest and thinning operations, retain hardwoods and non-target conifer species for diversity and future wildlife habitat in the stand.

Both of these standards identified in supporting documents of the project area and relationship between the Chippewa National Forest and the LLBO indicate the mutual intent that active commercial timber harvesting will continue to be an important aspect of the Winnie Sand project area and not the "hands off" management typically prescribed to "old growth" designated stands.

Because of the possible long-term implications of applying "Old Growth" terminology as a DVC in a large portion of this project area, RGS & AWS request clarity around the use of the term "Old Growth" and if future management practices beyond this project scoping will include the use of timber harvesting practices. While up-front this project appears to advance the forest condition closer to that of being in-line with the NRV and HRV found within the Forest Plan, we are concerned that classifying these areas as "Old Growth" will inadvertently tie the hands of future managers and communities through misinterpretation. We feel that the "Old Growth" language could remove timber harvesting as a tool to create/maintain NRV and HRV of forest characteristics long-term. We suggest defining these areas as "Extended Rotation Management Areas" with the intent to create old growth "characteristics" is more consistent with the 2019 MOU, Desired Vegetative Conditions Implementation Guide, and Co-management documentation language and could help avoid any unintended confusion around the purpose and desired future outcomes of this project. Additionally, comparing the LLBO's Desired Vegetative Conditions: DVC-1 to the outcome of Forest Service

Old Growth definitions as part of Executive Order 14072 (Old Growth RFI (Fed. 87 Fed. Reg. 42493-42494, No. 2022-15185) could help reach a level of standardization of terms and clarification around the project.

In closing, with the Winnie Sands Project being an important ecological restoration and forest habitat undertaking, RGS & AWS is standing by to continue to build and foster any needed capacity towards our shared stewardship relationship with the Chippewa National Forest through our Forest Service Master Stewardship Agreement, as well as build and foster a habitat and stewardship relationship with the Leech Lake Band of Ojibwe to address forest health, distribution, composition, age class, and ecosystem services concerns in and around the Chippewa National Forest.

Thank you for your time and consideration,

Jon Steigerwaldt
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