

Crow Wing County

Land Services Department

High Conservation Value Forest Assessment

November 10, 2010

Final Recommendation following Public Comment & Staff Review

*Prepared with assistance from Dovetail Partners, Inc.*

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### Abbreviations

CWC - Crow Wing County  
DNR – Department of Natural Resources  
FSC – Forest Stewardship Council  
HCVF – High Conservation Value Forest  
MCBS – Minnesota County Biological Survey  
RTEs – Rare, Threatened or Endangered species

### *Sources of Additional Information*

The High Conservation Value Forest Tool Kit – Edition 1  
December 2003  
ProForest  
Available online:  
<http://www.proforest.net/objects/publications/HCVF/hcvf-toolkit-part-1-final.pdf>  
FSC-US HCVF Assessment Framework July 2010

## Introduction

In 2008, Crow Wing County achieved third-party forest management certification for the 103,000 acres managed by the Land Services Department.<sup>1</sup> A requirement of Forest Stewardship Council (FSC) certification is the completion of a High Conservation Value Forest (HCVF) process.

## Process

There are four components of the HCVF process: Assessment, Consultation, Management and Monitoring (Box 1).

### **Box 1. Four Components of the HCVF Process**

- 1) Assessment to determine the presence of High Conservation Value Forests is completed, appropriate to scale and intensity of forest management.*
- 2) The (public/stakeholder) consultative portion of the certification process reports the identified conservation attributes and options for their maintenance*
- 3) The management plan shall include and implement specific measures to maintain and/or enhancement of the high conservation values*
- 4) Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the identified HCVFs (Monitoring may include a variety of techniques and does not necessarily require annual on-site visits by the land manager.)*

## Assessment

Prior to becoming certified, the CWC Land Services Department participated in a collaborative certification preparation process with a group of county land departments, the Minnesota Counties Sustainable Forest Cooperative (MCSFC). In March 2005, Beltrami, Becker, Carlton, Clearwater, Crow Wing and Koochiching Counties formed a Cooperative with the goal of achieving dual forestland management certification. On April 11, 2006, the Crow Wing County Board of Commissioners adopted a Sustainable Forest Management Policy and a Statement of Operational Commitments consistent with the requirements of certification and the policies of the MCSFC. A component of this process was the

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<sup>1</sup> SFI certified in December 2008; FSC certified in November 2009

development of policies and protocols addressing the HCVF process. Procedure LD-PS4 of the MCSFC Management System addresses Conservation Areas.

The HCVF assessment process includes several specific steps and considerations.

#### Assessment Steps

1. Internal staff analysis of available data to be completed by July 2, 2010.
2. Advisory Committee review of staff analysis completed by July 30, 2010.
3. 60 day public review and comment on HCVF analysis begins August 2, 2010 and closes October 1, 2010.
4. Advisory Committee review of public comment completed by October 29, 2010.
5. Summary of findings of HCVF analysis made available on the Public Page of the Cooperative's website. (Anticipated to occur by 12/31/10)

The High Conservation Value Attributes to be assessed have been defined for the United States through the Forest Stewardship Council's standards setting process. The general attributes are described in Box 2. The specific guidance developed for the FSC region that includes Crow Wing County is included in Box 3.

#### **Box 2. Defined High Conservation Value Attributes Used to Identify Potential HCVF Areas**

HCV1. Globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).

HCV2. Globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.

HCV3. Areas that are in or contain rare, threatened or endangered ecosystems.

HCV4. Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).

HCV5. Forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).

HCV6. Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).

In accordance with HCVF requirements, several sources of information were utilized to identify areas with potential HCVF Attributes in Crow Wing County.

#### Sources of Information Used in HCVF Assessment

- Minnesota County Biological Survey (MCBS) data
- Minnesota Historical Society Archaeological and Historic Sites records
- Field Observations and CWC Land Services Department Staff experiences
- Public Comments/Stakeholder Concerns

The Minnesota County Biological Survey (MCBS) is a key HCVF assessment tool because it systematically collects, interprets, and delivers baseline data on the distribution and ecology of rare plants, rare animals, native plant communities, and functional landscapes needed to guide decision-making. The Minnesota County Biological Survey was a key piece of information because this data includes several categories of potential HCVFs.

#### Categories of HCVF included within the MCBS:

- HCV 1: Endangered Species
- HCV 2: Native Plant Communities
- HCV 3: Rare, Threatened or Endangered species or habitats

#### **Box 3. HCV Attributes Defined for the North Woods/Lake States**

- Old growth – (*defined as: a stand or forest that demonstrates old-growth characteristics and is unroaded or lightly roaded, with no evidence of previous logging.*)
- Old forests/mixed age stands that include trees >120 years old
- Blocks of contiguous forest, > 500 ac, which host RTEs
- Oak savannas
- Hemlock-dominated forests
- Pine stands of natural origin
- Contiguous blocks, >500 ac, of late successional species, that are managed to create old growth
- Fens, particularly calcareous fens
- Other non-forest communities, e.g., barrens, prairies, distinctive geological land forms, vernal pools
- Other sites as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund's Forest Communities of Highest Conservation Concern

#### **Box 4. Review of HCV potential for Crow Wing County**

HCV1. Globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).

*Surveys of forests within Crow Wing County have identified the potential for endangered species. Red-shouldered hawk (specie of special concern) habitat areas offer outstanding biodiversity values (MCBS). This information was used to identify areas of CWC managed lands that may have this HCV.*

HCV2. Globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.

*Large, intact landscape scale forests with RTE populations include intact habitat types at least 500 acres in size. These types of large forests generally do not occur within the lands managed by Crow Wing County Land Services Department.*

HCV3. Areas that are in or contain rare, threatened or endangered ecosystems.

*Surveys of forests in Crow Wing County have identified old forests as being a rare ecosystem. Old forests are generally defined as being dominated by an age-class of trees approaching 120 years old. This information was used to identify the potential for HCV3 on Crow Wing County managed lands.*

HCV4. Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).

*Available information about the local watersheds, water quality monitoring and soils were used to identify the potential for HCV4.*

HCV5. Forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).

*Public comments and local experience was used to identify the potential for HCV5 areas.*

HCV6. Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).

*Available historical and archeological records as well as public comments were used to identify the potential for HCV6 areas.*

## HCVF Assessment Findings for each North Woods/Lake States Category:

### Old-Growth

- Crow Wing County Land Services does not manage any lands that meet the HCV definition of old growth. Forests throughout Crow Wing County have road access and show evidence of previous logging, including skid trails, stumps, etc.

### Old Forests/mixed age stands that include trees >120 years old

- Crow Wing County does have areas of old forests that are greater than 120 years old

### Blocks of contiguous forest (>500 acres) which host rare, threatened or endangered species; Contiguous blocks (>500 acres) of late successional species that are managed to create old growth

- Crow Wing County does not have contiguous areas of forest greater than 500 acres in size and containing rare, threatened or endangered species
- Crow Wing County does not have contiguous blocks of forest greater than 500 acres and with late successional species that are available to be managed to create old growth

### Oak Savanna, Hemlock- dominated forests, Pine stands of natural origin

- Crow Wing County does not have Oak savanna native communities
- Crow Wing County does not have Hemlock-dominated forests
- Crow Wing County may have some pine stands of natural origin that generally correspond to areas of old forest

### Fens; Calcareous Fens

- Crow Wing County does not have fens or calcareous fens

### Other non-forest communities (barrens, prairies, distinctive geological land forms, vernal pools)

- Crow Wing County has identified some unique communities, including an island habitat (i.e., Big Island) that also has old forest.

### Other sites as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund's Forest Communities of Highest Conservation Concern

- Crow Wing County has utilized the Minnesota County Biological Survey and the State of MN- Natural Heritage Database Inventory to identify special concern, rare, threatened or endangered species and habitats

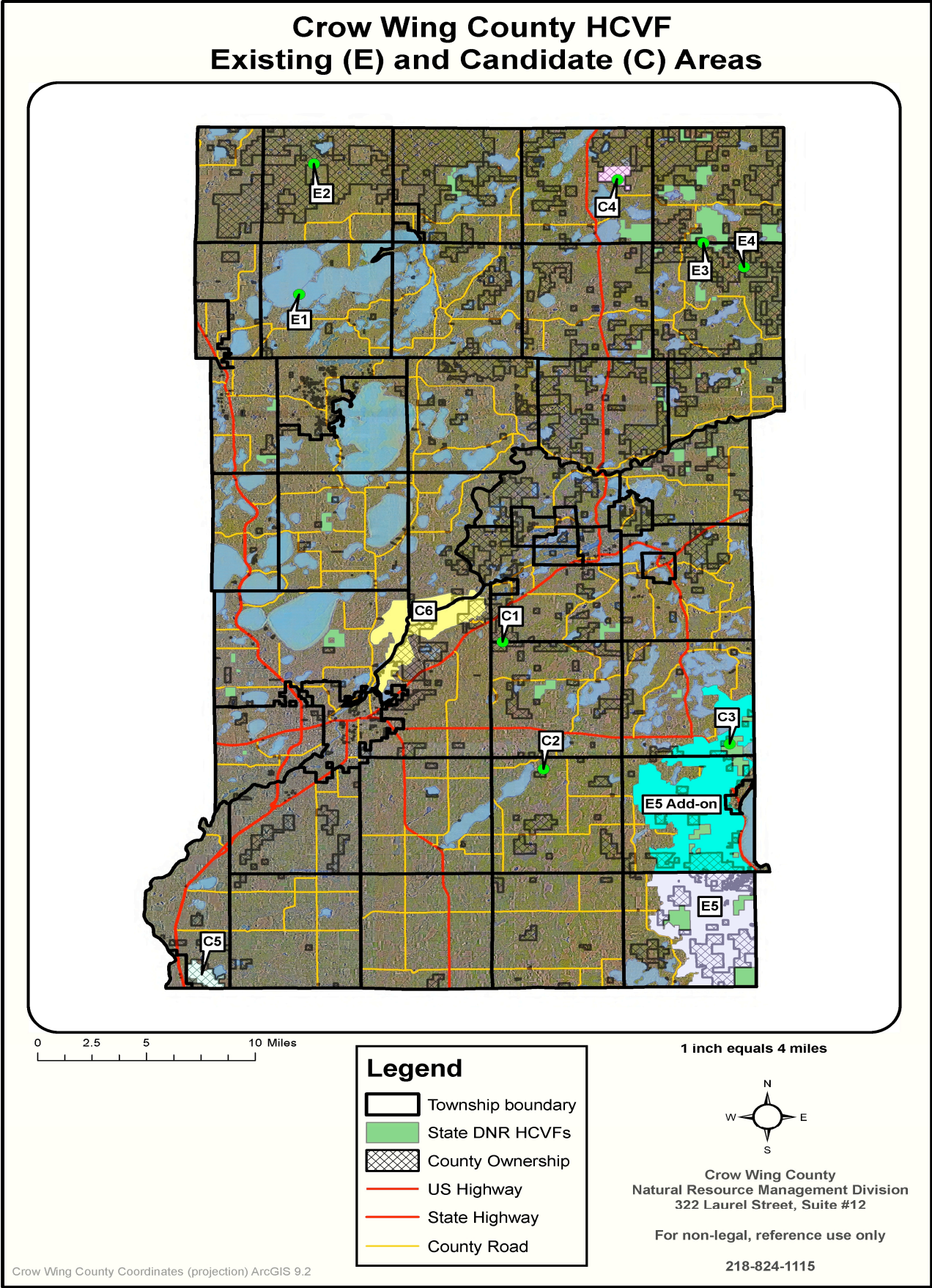
## ***Assessments Results***

The results of the Assessment included the identification of 5 sites as existing HCVF areas that the county is committed to managing and monitoring for specific identified HCVs. An additional 6 sites were identified as candidate HCVFs pending the results of the consultation step of the process and further review of the management and monitoring requirements. The existing and candidate sites are shown in Figure 1 and listed within Tables 1 and 2

Following the public consultation and staff review of public comments, Land Services staff made an assessment recommendation for each site. This recommendation can be found in the column titled, **“Land Services Department Recommendation”** in Tables 1 and 2.



Figure 1.



**Existing** High Conservation Value Forests (HCVF) for Crow Wing County Managed Tax-Forfeit Lands

*Crow Wing County Land Services Department*

**Table 1. Summary of EXISTING HCVF Areas (all areas have a Conservation Area Management Plan in place).**

<b>Map Location</b>	<b>Descriptive Name of HCVF Area</b>	<b>Legal Description of Location*</b>	<b>Description of High Conservation Value</b>	<b>Sources of Information Used to Identify HCVF</b>	<b>Size (acres)</b>	<b>Management and/or Monitoring Considerations</b>	<b>Land Services Department recommendation</b>
E1	Big Island	Sec. 17 T.137-R.28	Old Forest; Northern Hardwood Forest	Individuals' concerns/desires. MCBS-outstanding	53 ac	Maintain ecosystem of northern hardwood forest.	Previously identified and approved by the CWC County Board as future old growth site and recommended by Public Land Management staff as HCVF.
E2	Norway Pine Future Old Growth	Sec. 9, T.138-R.28	Future old forest red pine (114 years old in 2010).	Field visit. MCBS - moderate	13 ac	Maintain integrity of mature red pine stand.	Previously identified and approved by the CWC County Board as future old growth site and recommended by Public Land Management staff as HCVF
E3	Birchdale WMA- N. Hardwoods Future Old Growth	Sec. 33, T.138-R.25 Sec. 4, T.137-R.25	Mature Northern Hardwood	Forest Inventory, Field visit, MCBS - high	52 ac	Maintain integrity of future old-growth hardwood stand.	Previously identified and approved by the CWC County

							Board as future old growth site and recommended by Public Land Management staff as HCVF
E4	Ross Lake-N. Hardwoods Future Old Growth	Sec. 11, T.137-R.25	Mature Northern Hardwood	Forest Inventory, Field visit, MCBS-high	40 ac*	Maintain integrity of future old-growth hardwood stand	Previously identified and approved by the CWC County Board as future old growth site and recommended by Public Land Management staff as HCVF
E5	Red-Shouldered Hawk Habitat Area	Sec. 22-27, 34-35, T. 43-R.28	Red-Shouldered Hawk Habit	MCBS-outstanding	2650 ac**	Maintain habitat areas for red-shouldered hawk.	Recommend for HCVF by Public Land Management staff for its outstanding rating from the Minnesota County Biological Survey.

\* Possible expansion of HCVF into adjacent forested wetlands (lowland conifer and lowland hardwoods) encompassing 300 additional acres of forested wetlands.

\*\* Possible expansion of HCVF into neighboring tax-forfeited areas (Garrison and Bay Lake Twps.) encompassing 4800 additional acres of forest habitat.

High Conservation Value Forests (HCVF) Assessment for Crow Wing County Managed Tax-Forfeit Lands

*Crow Wing County Land Services Department*

**Table 2. Summary of HCVF Candidate Areas**

<b>Map Location</b>	<b>Descriptive Name of HCVF Area</b>	<b>Legal Description of Location*</b>	<b>Description of High Conservation Value</b>	<b>Sources of Information Used to Identify HCVF</b>	<b>Size (acres)</b>	<b>Management and/or Monitoring Considerations</b>	<b>Land Services Department recommendation</b>
C1	Wolf Lake Ski Trail System	Sec. 6, T.45-R.29 Sec. 31, T.46-R.29	Large diameter red and white pine trees.	Individuals concerns/desires.	64 ac	Maintain large diameter red and white pine trees.	This site does not meet tree age requirement for HCVF. Defer designation and continue to monitor as candidate HCVF during annual management review.
C2	Maple Grove Twp - Upper So. Long Lake	Sec. 4, T.44-R.29	107 year old red and white pine stand. Watershed protection	Individuals concerns/desires. MCBS - moderate	37 ac	Maintain integrity of stand consisting of mature red and white pine trees.	This site does not meet tree age requirement for HCVF. Defer designation and continue to monitor as candidate HCVF during annual management review.
C3	Bay Lake Twp -Round Lake	Sec. 35, T.45-R.28	Mature Northern Hardwood	Adjacent DNR lands. MCBS - high	84 ac	Maintain integrity of stand consisting of large diameter hardwoods.	Defer designation and continue monitoring during annual management review. No change in existing forest management

C4	City of Emily White Cedar Wetlands	Sec. 14, 15, 23 T.138-R.26	Old white cedar trees within forested wetlands.	Forest Inventory, MCBS-high	198 ac	Maintain integrity of stand(s) consisting of white cedar within forested wetlands.	Defer designation and continue monitoring during annual management review. No change in existing forest management.
C5	Sebie Lake Oak Mgmt. Area	Sec. 26, 35, 36 T. 43-R.32	Social resource of oak forest (hunting, recreation).	Forest Inventory, Social history of area	590 ac	Management of oak resource for social values.	Remove as a candidate. Site does not meet HCVF definition, because there is no change in existing forest management.
C6	Mississippi River Riparian Area	Sec. 4, T.134-R.27 Sec. 24, 27, 33 T. 46-R.30	Riparian and Archeological protection.	Natural Heritage & Archeological databases	189 ac	Protect riparian and archeological features.	Remove as a candidate. Site does not meet HCVF definition. The protection of riparian and archeological features are covered by existing policies and procedures for riparian and archeological sites

\* Some location details may be omitted to protect confidential or at risk information.

## ***Consultation***

Following the completion of the assessment, the next step of the HCVF process is to engage in public consultation to review the general findings and receive public input. The consultation will include a 60 day comment period. The full schedule for the assessment process is as follows:

1. Internal staff analysis of available data to be completed by July 2, 2010.
2. Advisory Committee review of staff analysis completed by July 30, 2010.
3. 60 day public review and comment on HCVF analysis begins August 2, 2010 and closes October 1, 2010.
4. Advisory Committee review of public comment completed by October 29, 2010.
5. Summary of findings of HCVF analysis made available on the Public Page of the Cooperative's website.

## ***Management***

Following the completion of the consultation, the Crow Wing County Land Services Department reviewed the management procedures for the HVCF areas and determined what if any changes to the management plan are needed to ensure the protection or enhancement of HCVs.

## ***Monitoring***

Following the completion of the consultation and management review, the Crow Wing County Land Services Department will review the monitoring procedures for the HVCF areas and determine what if any changes are needed to evaluate the effectiveness of management and the protection of HCVs.

## ***Summary of Public Comments***

Crow Wing County

Land Services Department

High Conservation Value Forest Assessment

November 8, 2010

Summary of Public Comments

*Prepared with assistance from Dovetail Partners, Inc.*

## Background

In 2008, Crow Wing County achieved third-party forest management certification for the 103,000 acres managed by the Land Services Department. A requirement of Forest Stewardship Council (FSC) certification is the completion of a High Conservation Value Forest (HCVF) process. In October 2009, Crow Wing County initiated a project to complete an HCVF assessment in conformance with the FSC standard.

## Public Consultation Process

Public meetings providing information about the HCVF process and lands managed by Crow Wing County were held on March 23<sup>rd</sup> and April 21<sup>st</sup>, 2010. The draft results of the HCVF assessment were prepared and made publicly available on July 26, 2010 with a 60-day public comment period announced through a news release and with information distributed to the project contact list and interested parties. The draft document was available online and upon request. An article about the public comment period was published in the local paper on July 28, 2010.<sup>2</sup> The comment period remained open through October 1, 2010.

## Summary of Results

A total of five comment letters were received. The complete comment letters are included in Appendix A. The following section provides a summary of the comments received and a response to each comment.

## Summary of Comments and Response to Comments

<i>Comment</i>	<i>Response</i>
Current work on a book of the Native American peoples in the Riverton, Mississippi River area of Crow Wing County will provide the factual basis to request an archeological survey of the area.	As new information becomes available the designation of HCVF areas can be reviewed and updated as appropriate.
Crow Wing County-owned land should be limited to conservative forest management practices and recreation that does not threaten future harvests, wildlife, vegetation and wetlands. In the past, the county has done a very good job in forest harvest management, and should continue this practice, thereby preserving and protecting our resources.	Comment acknowledged. The HCVF assessment process aids in the identification and appropriate management of sites with unique conservation values, including specific forest types and habitats as defined within the HCVF standard.
Recreation and hunting pursuits should be continued, so long as they do not affect the	Comment acknowledged. The HCVF standard requires that management

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<sup>2</sup> 28 July 2010, Brainerd Dispatch,  
[http://www.brainerddispatch.com/stories/072810/new\\_20100728038.shtml](http://www.brainerddispatch.com/stories/072810/new_20100728038.shtml)



long-term success of wildlife, vegetation and wetlands and the displacement of users who prefer quiet recreational pursuits.	activities in HCVF designated areas be designed to maintain or enhance the identified categories of high conservation value.
There is a need for all types of recreation. Quieter pursuits should not be given any less consideration than motorized recreation. With thoughtful consideration, careful planning and ongoing evaluation, all types of recreation can be accommodated.	Comment acknowledged. Areas of the Wolf Lake Ski Trail System has been identified as a candidate HCVF area due to the presence of large red and white pines (HCVF Old Forest Category).
Any forestry plan should establish a threshold percentage of forest that should never be harvested.	Crow Wing County has identified 821 acres of forestland reserved from harvest and beyond the scope of HCVF. Designated HCVF areas do not necessarily represent no harvest areas. Harvesting and other management activities in HCVF areas must be designed to protect or enhance the identified conservation values.
The current plan considers only rare, threatened or endangered species or habitats for protection and fails to prevent other species from becoming endangered in the future.	The scope of the assessment is defined within the HCVF standard. Other wildlife management considerations are addressed within the general forest management plans and other documents that are prepared by the county (i.e., Project Plans) and go beyond the scope of the HCVF standard.
In townships with nearly 50% lake cover, every bit of land is needed to maintain wildlife corridors and there is unchecked development.	Comment acknowledged.
A 30-acre parcel of tax forfeit land is being harvested adjacent to the Uppgaard Wildlife Management Area and includes 100+ year old red pines.	The Project Plan for this proposed harvest calls for all oak and red pine to be reserved from harvest.
It is arrogant for human beings to believe that any artificial, man-made forest could be truly better than an authentic, original forest.	Comment acknowledged.
Crow Wing County is failing at its charge to protect the county forest asset and should not be given certification by the FSC.	Determining award or renewal of certification is the responsibility of the certification body's auditing team and is not within the scope of this assessment.
Widespread ATV damage throughout the forest is resulting in damage.	Comment acknowledged. The HCVF standard requires that activities in HCVF designated areas be designed to maintain or enhance the identified

	categories of high conservation value in those areas.
It is inconceivable that only 4,000 acres fit the HCVF criteria (less than 4%).	Comment acknowledged. Crow Wing County has identified 821 acres of forestland reserved from harvest and beyond the scope of HCVF.
I believe that the HCVF criteria are too narrow and need to include a longer-range perspective. They should protect and preserve the large contiguous forests and consider the impacts of motorized noise on wildlife and the spread of terrestrial invasive plant species.	The HCVF criteria have been defined by the FSC and further articulated by the multi-disciplinary Lake-States Central Hardwoods Working Group.
The FSC should consider the issues of scale and population growth and the political climate of the county.	This is interpreted as direction to FSC.
The public needs to be vigilant to ensure that our public lands are maintained and enhanced by a vision toward conservation.	Comment acknowledged.
The plan talks about contiguous forest of 500 plus acres that have rare, threatened or endangered species. Why does the plan focus on much smaller parcels?	Each category of HCVF was assessed for occurrence within the county managed lands. An area of Red-Shouldered Hawk Habitat was identified as fitting within Category 1 HCVF with additional relevance to Category 2. More than 2,600 acres of habitat area were identified.
Seven of the 11 HCVFs are 40 to 80 acre or smaller and not big enough to be considered as forests.	The HCVF standard does not define a minimum size.
Five of the seven are in the northern tier and this is a token to maintain or enhance the conservation values.	HCVF designation is not the only tool for informing management activities. HCVF is a specific designation that functions within the full scope of the county's management planning and activities.
The entire large contiguous public lands in the northern tier townships should be considered as a high conservation value conservation area because of its large contiguous size, the diversity of vegetation and numerous wetlands. We know very little about this area when it comes to rare, threatened and endangered species. When considered with the adjoining land in Cass County, this 50,000-acre area is ripe for the immigration of rare,	Comment acknowledged. The HCVF designations can be updated as needed based upon the availability of new information that identifies an area as meeting a specific HCVF category.

threatened or endangered species. This area is a refuge from the human impacts that occur in the counties.	
The DNR restricts the deer harvest in the northern tier to bucks only and allocates only 3,500 antlerless permits. CWC should close this area to motorized recreation and apply the DNR's statewide standards for ATV use during hunting season.	Comment acknowledged.
It appears that the Open Space vision has been changed for the High Conservation Value Forest concept.	HCVF is a requirement of FSC certification and became a requirement for the county in 2008.
We need the big woods for wildlife, non-motorized recreation and to preserve something for future generations.	Comment acknowledged.

## **Appendix A: Public Comments and Letters**

*Letter #1*

October 1 2010

HCVF Comments  
c/o Dovetail Partners  
Attn: Katie Fernholtz  
528 Hennepin Ave, Suite 202  
Minneapolis, MN 55403

RE: Historic and Cultural Considerations in the Crow Wing State Forest and tax forfeited properties held in the public trust by Crow Wing County in the areas locally known as the Cuyuna Range.

Dear Ms. Fernholtz:

It has been brought to my attention that a FSC certification standard is being applied to forests located in Crow Wing County, to determine high conservation value forest areas which will serve to inform the comprehensive trails plan.

My education and professional background (see attached) have enabled me to become an expert of Native American presence in the above referenced properties. I believe that I can provide substantial information delineating the forests of the Cuyuna Range as an integral part of the cultural and historic record of the people indigenous to this area of Minnesota.

I have been commissioned to write and am currently working on a book of the Native American peoples in the Riverton, Mississippi River area of Crow Wing County and an extant portage trail that connected several lakes of the Cuyuna Range. This work will provide the factual basis to request an archeological survey of the area culminating in application for National Register of Historic Places designation.

I believe the substance of my work will be introduced at an upcoming Crow Wing County Comprehensive Recreation Plan meeting regarding “water trails”. I did want to take advantage of this opportunity to introduce myself and to make your organization aware of the work in progress which will have consequences for decisions made for the forest areas of Crow Wing County.

Thank you for the thought and care given to our forest areas.

Sincerely,

Paula Robinson

*Letter #2*

Subject: Crow Wing County

Date: Monday, October 4, 2010 3:14AM

(This should have reached you on Oct. 1; but respectfully hope that the negligible delay will not affect its submittal.)

To: Dovetail Partners

528 Hennepin Ave, Ste. 202, Minneapolis, MN 55403

Subject: Public Comment – Crow Wing County HCVF Assessment

General Concerns:

**The very minimal amount of HCV Attributes in Crow Wing County lands:** Using the minimal amount of “HCV Attributes” as a justification to continue a full-scale harvesting of our forests is incredibly backwards. The reason we have such a small amount of HCV Attribute land is because of the past forestry/agricultural practices that have decimated native forest. With less than 5% of the original forests left in the state, ANY FORESTRY PLAN SHOULD ESTABLISH A THRESHOLD PERCENTAGE OF FOREST THAT SHOULD NEVER BE HARVESTED; i.e., A QUANTITY & QUALITY OF FOREST THAT IS ALWAYS PRESERVED. IF THERE IS NOT ENOUGH FOREST TO MEET THE THRESHOLD, THEN PERMANENT FOREST RESTORATION MUST BE ESTABLISHED BEFORE THE REMAINDER CAN BE CONSIDERED FOR “SUSTAINABLE” FOREST AGRICULTURE. Anything else is just a prurient exploitation of land for money.

**The serious deficiency of concern for wildlife management.** The terms “biodiversity” and “ecosystems” are the cornerstone of proper natural resource management, and they are meaningfully utilized only when ALL flora and fauna are an integral part of any management process. The current plan considers only rare, threatened or endangered species or habitats for protection; this ultimately means you are failing to employ enough foresight to prevent other species from becoming endangered in the future. All over the state, wildlife counts are declining; continually ruining the wildlife habitat by putting the majority of remaining forests into full forest harvest rotation is just digging a biodiversity grave.

**Problematic example of forest management practices:** The geographical township I live in (Ideal Townships, 36 sq. miles), is under nearly 50% lake cover. Every bit of land is needed to maintain wildlife corridors/habitat not only because of the large amount of water, but because the County continues to allow unchecked development in the area.

Currently, a 30-acre parcel of Tax Forfeit Land (TFL) is being considered for timber harvest, with nearly a full clear cut of the land. This parcel not only has lakeshore, a marsh, 25-ft elevation changes, 100+year old red pines, and supports a plethora of wildlife, it shares a border with the Uppgaard Wildlife Management Area. This particular WMA is the first “Landscaping for Wildlife Demonstration Area” in the state. It exists as a tool to demonstrate and educate the public on the restoration and value of wildlife habitat. The County’s attempt to turn the adjacent TFL acreage into an agricultural crop, in perpetuity, is not only in great disrespect and hypocrisy to the principles for which the WMA stands, but shows a plain reckless and blind understanding of natural resource management.

To pretend that “sustainable forestry” is going to “protect and enhance these natural resources” in all but a few instances is folly. It is actually very arrogant for human beings to believe that any artificial, man-made forest could be truly better than an authentic, original forest (unless of course your primary goal is money). Eventually, after continual rotation, the soil will be severely depleted and the natural, symbiotic wildlife habitat destroyed.

Mother Nature has been building and rebuilding outstanding forests for the last 10,000 years since the glaciers departed, continually replenishing the soil through natural succession and sustaining balanced ecosystems. Your current forestry plan is very short-sided and deleterious to what small amount of Mother Nature’s forests we have left.

Sincerely,  
Stephanie Foster  
PO Box 133  
Pequot Lakes, MN 56472

*Letter #3*

Please include this comment in the public record.

I believe the Crow Wing County land department is failing at it's charge to protect the county forest asset and should not be given certification by the FSC.

Our county has a large mass of public forest but the land department has fragmented it to the point it no longer functions as it should. In 103,000 acres there is no areas left for solitude because of the fragmentation.

Our county is allowing widespread ATV damage throughout the forest and this is resulting in high levels of phosphorus laden waters leaving the watershed and entering our lakes.

Here are just a few photos of the ATV damage that is occuring in our forest.

<http://www.crowwingcountymn.org>

Areas that have soil types and high water tables that are completely unsuitable for motorized recreation are left completely unprotected and are rapidly becoming damaged.

Sincerely,  
John Reynolds  
26385 County Road 3  
Merrifield MN 56465

*Letter #4*

-original message-

Subject: re: HCVF Comments for Crow Wing County

From: "Becky Eckelman"

Date: 10/01/2010 8:49 AM

Hello Katie. Would you please include the comments below for the HCVF in Crow Wing County. I believe the deadline is today. Thank you so much.

Comments:

Crow Wing County-owned land should be limited to conservative forest management practices and recreation that does not threaten future harvests, wildlife, vegetation and wetlands. In the past, the county has done a very good job in forest harvest management, and should continue this practice, thereby preserving and protecting our resources.

In the past, county-owned land has been used for recreation and hunting purposes. These pursuits should be continued, as long as they do not affect the long-term success of these forest lands with regard to wildlife, vegetation and wetlands, and the displacement of users who prefer quiet, recreational pursuits. There is a need for all types of recreation opportunities, however, there has to be balance, as often, different types of recreation do not mix well together.

The quieter pursuits of hunting, hiking, horseback riding and cross country skiing should not be given any less consideration than motorized recreation on Crow Wing County-owned land. We believe, with thoughtful consideration, careful planning and ongoing evaluation, all types of recreation can be accommodated. However, there are fewer and fewer spaces available to the public to view and quietly enjoy nature. Crow Wing County needs to protect its valuable forest resources and quiet spaces for future generations.

Mark and Becky Eckelman  
Crow Wing County



## **High Value Conservation Forests are Important in the Trails Mix**

With more than 100,000 acres of tax-forfeited land in Crow Wing County (CWC) it is inconceivable that only 4,000 acres fit the High Value Conservation Forest (HVCF) criteria in the draft assessment prepared by county staff. That's less than four per cent.

Table 4 in the draft plan, 5 existing parcels of HCVF total about 2,808 acres and the 6 HCVF candidates total about 1,162 acres. That is 3,970 acres of conservation value forest on public lands in all of CWC.

County staff identifies HCVFs largely from a forest/timber perspective. But because CWC has tossed HCVFs into the recreational trail planning process, I believe that the HVCF criteria are too narrow, and that they need to be broadened to include a longer-range perspective. They should protect and preserve the large contiguous forests.

They also need to look at forest impacts from the different types of trail and forest users. Not all user groups impact the forest environment in the same ways. (See Public Land Forest Trail Impacts page 7.) They should consider the impacts of motorized noise on wildlife and the spread of terrestrial invasive plant species.

It is difficult to manage and enforce a recreation policy that doesn't include the human impact component because, "we don't manage the environment, we manage human impact on the environment."

## **How much is enough?**

This was an important question poised by a DNR employee 10-years ago when discussing how much public land should be turned over to motorized recreation, specifically to ATVers, as opposed to less damaging forms of outdoor recreation.

Since he made the statement, registration of new ATVs has been declining. ATVer deaths are increasing, far ahead of all other forms of forest recreation, including hunting when hundreds of thousands of guns are in the woods.

Other forms of recreation are growing; believe it or not; wildlife and bird watching are surging. Deer hunting is holding its own. And, new forms of recreation come along, like geocaching.

So, how much public land should be allocated for various user groups, some types that overlap one another?

With a limited amount of public land and a growing population in CWC, it is obvious that we don't have enough public land to meet everyone's recreation demands, especially those activities that are consumptive, destructive and/or costly in nature.

Will public land space be allocated according to the size of the user group rather than by how much another group demands or wants, or how much they can afford? Without specific goals, it is likely that the outcomes of any planning process would lead to an unjustified imbalance? Did I hear you say "unintended consequences"?

Certainly it has been proven over and over again, and largely agreed upon, that most forms of motorized and non-motorized recreation don't mix well. They don't mix well in the "multiple use trail" red herring mantra of ATVers.

And, do we believe that we are obligated to pass on our natural resources and a sustainable environment to the next seven generations? It is noble to leave the land in better shape than we found it.

So, is his question, "How much is enough", still relevant?

### **Why Here?**

Crow Wing County has been a desirable recreation destination for decades. Three or four generations back, city dwellers liked to come here to enjoy our lands and lakes. Tourism followed the loggers in the early 1900's...more than a hundred years of tourism.

Our natural resources allowed us to grow and prosper. The vast majority of the people came for passive recreation, relaxation, hunting, fishing and quiet places.

The current economy will improve over time and more people will want to recreate in Crow Wing County. It is a reasonable drive from most major Minnesota and Iowa metro areas. We have natural resources and open space here that they come to enjoy. Some stay and find jobs.

As this happens, development, lots, roads and trails will further fragment the land, both private and public.

### **What's special about CWC?**

Unlike the surrounding counties of Cass and Aitkin, Crow Wing has much less public land per capita.

Using 2007 data and considering all public lands within the county, Aitkin Co, has about 40 acres of public land per person, Cass Co. has about 25 acres per person and Crow Wing has just over two (2) acres of public land for each of its 60,000 people.

Those two other counties have more public land on which to spread out recreation. They can provide buffers between recreation types and private land. With more land, these counties don't have to infringe on wetlands, creeks and rivers. They don't have as much damage to mitigate.

The Forest Stewardship Council (FSC) certification should consider the issues of scale and population growth in the FSC recreation component. It is common sense that a good FSC policy would consider the size and trends of the market as a plan component.

### **Common Sense**

No one has perfect common sense. But, science and common sense usually work well together.

I think it is important that the FCS organization also consider the political climate of the county. Many people feel that the current Crow Wing commissioners are less friendly toward the natural resources than other counties; consider the

recent articles in the Star Tribune citing CWC. There has to be some truth in all of that ink.

Do the CWC commissioners see the public land as an asset to spend today rather than as a heritage to protect?

Connecting the recreational trail planning with the HCVFs, Kathryn Fernholz-Dovetail Partners, wrote, "The long term management of the HCVF areas will include efforts to maintain or enhance the conservation values identified in each area. The areas remain available for recreation and management activities, so long as those activities do not negatively impact the conservation values. If current uses in the areas are compatible with the conservation values, those uses will continue. If future uses or changes in use are proposed for an HCVF area, the proposed use or activity will be evaluated for potential impact to the identified conservation value."

This is a very subjective guideline statement that leaves mostly loose ends for interpretation. It leaves room for political maneuvering. The public needs to be vigilant to ensure that our public lands are maintained and enhanced by a vision toward conservation, rather than toward economic development, as now appears to be the case in CWC.

As CWC maneuvers for economic stability, a very limited and strictly enforced use of ATVs on public land and ditches is a meaningful thing to do that costs little or nothing. Limited areas of use allows for focused enforcement, containment of damage, limited impact on residential areas, limited impact on wild life and accountability of the ATVers.

Across the country and here in Minnesota, ATVers have been cited as being one of the top four threats to our public forestlands.

### ***RTE's***

Note that box 4 in the CWC draft HVCF plan talks about contiguous forest of 500 plus acres that have RTEs. While we have no recent ground-truthing about RTEs in this area of CWC, there must be something magic about it taking 500 acres of natural habitat to support a species. So why does the CWC draft HVCF plan focus on much smaller parcels?

Seven of the 11 HCVF's in the plan are 40 to 80 acres or smaller. These "existing and for consideration" HVCFs are not big enough to seriously be considered as "forests." You can holler across them.

Five of the seven are in the northern tier of CWC. Protecting five-scattered and small parcels is a token, if not a disingenuous effort, to "maintain or enhance the conservation values" of 26,000 acres of public land in the northern tier. With this kind of a fragmented checkerboard plan, RTE's and all other wildlife don't stand much of a chance to migrate to escape motorized recreation.

### **Noise and Invasive Species**

The following was summarized from 28 authoritative published references:

“Off road vehicles (ATV) noise can cause significant adverse impacts to wildlife in at least two ways. First, exposure to ORV (ATV) noise can result in hearing impairment or even loss, with severe consequences for animals dependent on their sense of hearing for finding prey, avoiding predators, and interacting with other individuals of the same species. Second, wildlife exposed to ORV (ATV) noise often experience stress and other disturbance effects.”

“Over time, such impacts can lead to altered movement patterns, behavioral changes, and long-term stress impacts, all with potentially significant adverse results.”

Not unlike Minnesota’s massive and expensive problem with invasive species in its popular lakes like Gull, invasive plants with colorful names like Spotted Knapweed, Leafy Spurge and Buckthorn are being spread to public lands via motorized access.

Highway licensed vehicle (HLV) owners are not likely to leave the normally hard-packed forest roads. But, they don’t call them All Terrain Vehicles for nothing and that’s exactly where ATVers like to ride them; anywhere they want.

ATV driver surveys discovered that “testing ATV riding skills and equipment” is near the top of the desires for a substantial portion of ATVers. The wetlands and swamps in CWC are ripe and receptive for invasive plant seeds dispersed by ATVers.

In a series of experiments between 2007 and 2009, a plant ecology research team at Montana State University, “saw that ATVs were capable of picking up as many as 200,000 seeds over 48 miles of travel (about 4,200 seeds per mile), out of which roughly 750 were from noxious weeds. And, that is on each and every ATV, on trail and off trail, for every mile they ride.

Knowing how the invasives snuck into our lakes, and the unimaginable cost to now mitigate the damage, CWC commissioners and staff should apply common sense that starts with a thorough and comprehensive inventory of existing invasive/noxious plants on all CWC public lands.

The existing invasives need to be eradicated and a yearly monitoring program should be established.

Following that, all future ATV trails must be regularly monitored and strictly enforced to eliminate the re-introduction of new invasives. The keys to prevention include locating ATV trails at least 1,000 feet from wetlands, creeks, ponds and seasonal flowages.

In Timothy Township this spring, even though it was so dry that the brush was crispy, the old logging trails were muddy and very soft because of the high water table and the clay soil that is prevalent in this area. The Timothy watershed feeds the Whitefish chain of lakes. If the runoff is impaired it will impact the chain of lakes; a major recreation area and a significant proportion of the CWC tax base.

Protecting water quality starts by protecting the land of the watershed.

## **Northern tier**

Putting a motorized recreation area in the middle of a large contiguous area of public land would solve only to get the ATVers away from private land. Out of sight, out of mind. But this use of about 26,000 acres of public land would be a great sacrifice. Once an area "goes motorized" it can never be changed back to a solitude area.

The entire large contiguous public lands in the northern tier townships should be considered as a high value conservation area because of its large contiguous size, the diversity of vegetation and numerous wetlands. In turn, this environment provides for a wide diversity of wildlife, birds and reptiles. This area is a jewel because it is a large, wild contiguous area.

The whole northern tier of CWC, about 26,600 acres of public land, is an intact habitat that we know very little about when it comes to Rare, Threatened and Endangered species (RTE's). When considered with the adjoining like amount of public land in Cass county, this 50,000 plus acre area of mixed forest types, wetlands and creeks is ripe for the immigration of RTE's that need to escape the more inhabited and developing private lands around it.

This large contiguous forest area is a refuge from the human impacts that occur in CWC and Cass counties. Animals and birds thrive in the vegetative diversity and water availability. I could start listing the species here, but common sense tells you that

a large wild area like this is home to a wide range of plants and animals that are also part of our economy and quality of life.

Look at the northern tiers in the county's draft plan and you'll note that the four existing HCVFs and the one candidate in the northern tier total about 356 acres: only a little over 1% of the entire 26,600 acres here is considered HCVF. And, 105 of these 356 acres are already protected in the form of the Big Island in Whitefish Lake and in the Birchdale Wildlife Management Area. Is this "balance"?

While we cannot dismiss the insightful Brainerd Lakes Area Conservation Collaborative (BLACC) report that says these northern tier townships have a lower conservation value than other parts of CWC, we need to remind everyone that this study was done at the computer, with existing maps and with studies that have not been updated with current field work. Nobody took a walk in these woods.

We're back to common sense. This is a large and rich wild area that deserves the strictest of protection....not for what we know, but for what we are yet to discover.

## ***Special deer management area***

Take a look at the DNR's deer management area map for the 2010 deer season. Note the dark gray area of CWC that is bordered by CSAH #1 on the south, the county line on the north and State #6 on the east side.

You will see that the DNR gives this northern tier of CWC a more restrictive deer harvest management feature. It is the borderline on which the DNR initiates one of its major management decisions.

The northern and eastern townships of CWC are Lottery Deer Areas #171 and #172. Most of the rest of CWC is a Managed Deer Area by the DNR, which means hunters can harvest either sex deer without entering a lottery, PLUS, hunters can purchase a bonus permit to harvest additional deer.

It would appear that the DNR is concerned about the size of the doe herd population in our northern tier, thus the sustainability of the herd. The DNR restricts the harvest in this part of the county to bucks only and allocates only 3,500 antlerless permits for these two large lottery areas.

In the rest of CWC, it appears that the DNR wants to shrink the size of the deer population by allowing a much more liberal harvest of does.

CWC shares the responsibility with the DNR to protect the habitat of this area to help the deer herd. One way to help would be for CWC to close this area to motorized recreation and apply the DNR's statewide standards for ATV use during hunting seasons.

### ***We Manage the People not the Environmental Resources***

This is a common sense perspective. We cannot tell the environment how to act, but we can only manage and restrict human impact on the environment in an attempt to protect it from being loved to death.

In doing so, we recognize that we are a Republic form of government and not a Democracy. If we were the latter, we could simply put the issue of ATV trails in CWC on the ballot where some people project that 95% of the voters would oppose more trails for ATVs. Most people would agree that the voters would not support ATV trails on public lands or along the road ditches.

It is not likely that the commissioners would agree to put the issue on the ballot. We elected them to make the hard decisions, like how much public land is enough for ATVs. We have to rely on the commissioners' political will, science and common sense.

Sometimes they are faced with a hot issue. You'd like to think that the commissioners would listen to the large majority of citizens. It is common sense that the more citizens that are involved in a decision-making, the better the outcomes. It should be a very rare situation where the commissioners ignore the will of the majority...even in a Republic.

The creation of ATV trails in CWC does not rise to the level of importance where the commissioners should ignore the people. Through CWC surveys, commissioner listening sessions, citizen committees, letters to the editor and e-mails, the commissioners have heard loud and clear that CWC citizens do not want ATV trails on public lands, in the road ditches or on township roads.

Commissioners and staff have said that the public is evenly split 50-50 on ATV trails, thus making a hard decision for them. Seeing the "No ATV trail" signs, reviewing the county's own surveys and the re-reading the preponderance of

written opposition, the spread appears to be closer to 95-5, with the majority opposing.

If this were not the case, why has it taken CWC more than 10 years to get a new ATV trail on the ground? The opposition to ATVer trails is strong and will not go away.

The issue is not about being anti-ATV or trails, but more importantly about protecting the public lands and lakes. The commissioners and ATVer clubs radicalize the citizens as being anti-ATV and tree-huggers. Most citizens are simply trying to protect the natural resources and environment from motorized destruction.

Just five-years ago, in 2005, CWC paid for a predecessor to the current Dovetail trail process. While the Dovetail process focus is only on recreation trails, the earlier exhaustive consultant/citizen committee process was much more comprehensive. The commissioners in office at the time approved the CWC Parks, Trails and Open Space Plan. It appears that the current commissioners wish to ignore the broader vision of the PTOS plan and instead impose their own vision for trails by using their bully pulpit.

### **Parks Trails and Open Space Plan (PTOS)**

It appears that Dovetail, its citizen committee, county staff and commissioners have not read and understand the Open Space section of the Parks, Trail and Open Space (PTOS) plan.

In establishing the Dovetail process, it appears they have changed the intent of the Open Space vision for their own High Value Conservation Forest concept. This change takes the focus off the public demand and need for solitude areas and open space for public recreation and substitutes the focus on the timber harvest value in order to comply with the FCS policy. This is narrow and short-term thinking.

It appears that this comprehensive PTOS plan is no longer available on the CWC website. I hope CWC will again put it on their website so it can become part of the educational background to be considered in the Dovetail process.

### **Conclusion**

We need the big woods for wildlife, non-motorized recreation and to preserve something for future generations of CWC.

The priority placed on and the land dedicated to motorized trails is disproportionate to the wide range of recreation needs of the majority of the citizens.

## **Public Land Forest Trail-User Impacts**

<b>Issues/Impacts</b>	<b>ATVers</b>	<b>Hikers</b>	<b>Bikers</b>	<b>Hunters</b>
Fragmentation	High	Low	Moderate	Low
Enforcement Challenge	High	Low	Moderate	Moderate
Noise	High	Low	Low	Low

Wildlife impact	High	Low	Low	Moderate
Off trail impact	High	Low	Moderate	Low
Social impact	High	Low	Low	Moderate
Cost to operate	High	Low	Moderate	Low
User displacement	High	Low	Low	Moderate
Local Economy	Low	Low	Low	Moderate
Safety/Dangerous	High	Low	Low	Moderate
Seasonal impacts	High	Low	Low	Low
Dust	High	Low	Low	Low
Invasive species	High	Low	Low	Low
Wetland/water impacts	High	Low	Low	Low
Trespass potential	High	Low	Low	Moderate
Miles/area required	High	Moderate	Low	High
Vegetation impacts	High	Low	Low	Low
Soil compaction	High	Low	Moderate	Low

**Summary:** It appears that ATVers have the highest impacts on our public lands, with hikers creating the lowest impact, while mountain bikers and hunters share the low to moderate range.

The values are a blend of what the DNR and other agencies have said and written, of documented research, after study of a vast amount of public opinion and from testimony heard at numerous public meetings relating to the impacts of forest trail use.

The greatest impacts occurred in the past 10-years with the advancement of motorized recreation and creation of more logging roads during an intensive poplar harvest period.

Elected officials and administrators of public lands should consider the impacts shown here and make long-range decisions. Attempting to meet the needs of a few high-impact motorized recreationists by allocating large public areas to their use at the expense of larger user groups that cause low to moderate impacts is short-range thinking.

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